Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
2.0 M01	The current technical specification (CTS) 2.1.1 Action states that whenever the point defined by the combination of RC core outlet pressure and outlet temperature (i.e., CTS Figure 2.1-1) has exceeded the safety limit to be in HOT STANDBY (MODE 3) within one hour. Under the same conditions in the ITS, ITS 2.2.2 requires the restoration of RCS pressure and temperature to within limits and to be in MODE 3 within 1 hour. This changes the CTS by adding a requirement to restore the reactor coolant system (RCS) pressure and temperature to within limits in addition to the requirement to be in MODE 3.	2.2.2	2.1.1 Action
2.0 M02	CTS 2.1.2 is applicable in MODE 1. Improved technical specification (ITS) 2.1.1.1 is applicable in MODES 1 and 2. This changes the CTS by requiring the safety limit to be met in MODE 2.	2.1.1.1	2.1.2
3.0 M01	CTS 4.0.2 states, "Each Surveillance Requirement [SR] shall be performed within the specified time interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval." ITS SR 3.0.2 states "The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met. For Frequencies specified as 'once,' the above interval extension does not apply. If a Completion Time (CT) requires periodic performance on a 'once per . . .' basis, the above Frequency extension applies to each performance after the initial performance. Exceptions to this Specification are stated in the individual Specifications." This changes the CTS by adding, "For Frequencies specified as 'once,' the above interval extension does not apply." The remaining changes to CTS 4.0.2 are discussed in Description of Change (DOC) A10 and DOC L02.	SR 3.0.2	4.0.2

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 M02	CTS 3.7.7 Action a provides the actions for inoperable snubbers, and requires one of the following (1, 2, or 3) within 72 hours when one or more snubbers are inoperable: 1) replace or restore the inoperable snubber(s) to OPERABLE status; 2) verify system operability with the snubber(s) inoperable by engineering evaluation; or 3) declare the supported system inoperable and follow the appropriate ACTION statement for that system. In the ITS, the actions for inoperable snubbers are incorporated into ITS limiting condition for operation (LCO) 3.0.8. When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and either: a) the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or b) the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours. At the end of the specified period (i.e., 12 hours or 72 hours) snubbers must be able to perform their associated function(s), or the affected system LCO(s) shall be declared not met. This changes the CTS by requiring the risk associated with inoperable snubbers to be assessed and managed and requires the snubbers to be restored to OPERABLE status in all cases, and in certain cases within a more restrictive CT.	LCO 3.0.8	3.7.7 Action a

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.2 M01	ITS SR 3.1.2.1 requires the core reactivity balance to be determined to be within ± 1percent Δk/k of the predicted value prior to entering MODE 1 after each refueling. The CTS does not contain a requirement to perform a core reactivity balance prior to entering MODE 1 after each refueling. This changes the CTS by adding an additional performance requirement for the core reactivity balance SR.	SR 3.1.2.1	None
3.1.3 M01	CTS LCO 3.1.1.3.a and LCO 3.1.1.3.b provide the maximum limits of the upper (positive) value for the moderator temperature coefficient (MTC). ITS LCO 3.1.3 maintains these maximum upper limits, but also includes a requirement that the MTC must be within the limit specified in the core operating limit report (COLR). This changes the CTS by placing a cycle-specific upper limit (which may be less than the limit maintained in ITS LCO 3.1.3) in the COLR.	3.1.3	3.1.1.3.a 3.1.1.3.b
3.1.3 M02	CTS 3.1.1.3 requires MTC to be applicable in MODES 1 and MODE 2 with keff ≥ 1.0. ITS 3.1.3 requires MTC to be within limits in MODES 1 and 2. This changes the CTS by expanding the applicability of the MTC requirements to include MODE 2 with keff < 1.0.	3.1.3 Applicability	3.1.1.3 Applicability
3.1.4 M01	CTS 3.1.3.1 Action b states that with more than one control rod (CR) inoperable or misaligned from its group average height by more than the allowed rod misalignment, be in HOT STANDBY within 6 hours. ITS 3.1.4 ACTION C states that with more than one CR not within alignment limit, verify SDM is within limits or initiate boration to restore required SDM to within limit within one hour, and be in MODE 3 in 6 hours. This changes the CTS by adding new requirements to verify SDM limits or to initiate boration to restore SDM limits.	3.1.4 ACTION C	3.1.3.1 Action b

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.4 M02	CTS 3.1.3.1 Action c states that with one CR misaligned, POWER OPERATION may continue provided that certain actions are completed within one hour. If those actions are not complete, CTS 3.0.3 would be entered requiring entry into Hot Standby (MODE 3) within 7 hours, for a total time from condition discovery to entry into MODE 3 of 8 hours. ITS 3.1.4 ACTION B states that if any Required Action and associated CT of Condition A (one CR not within alignment limits) is not met, the unit must be in MODE 3 within 6 hours. The shortest CT in ITS 3.1.4 ACTION A is one hour. Therefore, under the ITS, the shortest possible time from discovery of the condition to entry into MODE 3 is 7 hours. This changes the CTS by providing one less hour for entry into MODE 3 following discovery of a misaligned rod if Required Actions are not met.	3.1.4 ACTION B	3.1.3.1 Action c 3.0.3
3.1.4 M03	The CTS 3.1.3.4 Action requires that with the drop time of any CR determined to exceed the limits of the LCO, to restore the rod drop time to within the limit prior to proceeding to MODE 1 or 2. No specific Actions are stated in CTS 3.1.3.4 if the unit is in MODE 1 or 2 when the rod drop time is discovered to not be within limits. CTS 3.1.3.1.c provides compensatory actions for when a CR is inoperable for reasons other than due to being immovable as a result of excessive friction or mechanical interference or know to be untrippable. CTS 3.1.3.1 Action c allows the plant to operate at a reduced power level as long as other compensatory actions are performed including a requirement to verify SDM. ITS 3.1.4 ACTION D applies with one or more CRs inoperable. It requires the verification of SDM to be within limits or to initiate boration to restore SDM to within limit within 1 hour, and requires the unit to be in MODE 3 in 6 hours. This changes the CTS by not allowing the plant to enter CTS 3.1.3.1 Action c under the same conditions in the ITS and includes requirements for SDM and being in MODE 3.	3.1.4 ACTION D	3.1.3.4 Action 3.1.3.1 Action c

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.4 M04	CTS 4.1.3.1.2 requires each CR not fully inserted to be moved at least 2 percent in any one direction every 92 days. ITS SR 3.1.4.2 requires the same verification every 92 days, except a 3 percent rod movement acceptance criterion is provided. This changes the CTS by requiring each CR not fully inserted to be moved 3 percent in any direction in lieu of the current 2 percent requirement.	SR 3.1.4.2	4.1.3.1.2
3.1.5 M01	CTS 3.1.3.5 is applicable in MODE 1 and MODE 2 with keff ≥ 1.0. ITS 3.1.5 is applicable in MODES 1 and 2. This changes the CTS by expanding the Applicability from MODE 2 with the reactor critical to all times in MODE 2.	3.1.5 Applicability	3.1.3.5 Applicability
3.1.5 M02	With one safety rod not fully withdrawn, CTS 3.1.3.5 Action b requires the safety rod to be declared inoperable within 1 hour. Under the same condition, ITS 3.1.5 ACTION A not only requires a similar action, but also requires either a verification that SDM is within the limit within 1 hour (ITS 3.1.5 Required Action A.1.1) or to initiate boration to restore SDM to within the limit within 1 hour (ITS 3.1.5 Required Action A.1.2). This changes the CTS by adding additional Required Actions when one safety rod is not fully withdrawn.	3.1.5 ACTION A	3.1.3.5 Action b
3.1.5 M03	CTS 3.1.3.5 Action only provides compensatory actions for a maximum of one safety rod not fully withdrawn. If two rods or more rods are not fully withdrawn entry into CTS 3.0.3 is required. CTS 3.0.3 requires the plant to be in Hot Standby (MODE 3) within 7 hours. ITS 3.1.5 ACTION B requires entry when more than one safety rod is not fully withdrawn and requires a verification of SDM to be within limit or to initiate boration to restore SDM to within limit within one hour and requires the plant to be in MODE 3 within 6 hours. This changes the CTS by establishing the SDM requirements and to place the unit in MODE 3 within 6 hours instead of 7 hours	3.1.5 ACTION B	3.1.3.5 Action 3.0.3

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.6 M01	CTS 3.1.3.2 Action states that with a maximum of one axial power shaping rod (APSR) inoperable or misaligned, operation may continue provided certain actions are completed within 2 hours. If those actions are not complete, CTS 3.0.3 would be entered requiring entry into Hot Standby (MODE 3) within 7 hours, for a total time from condition discovery to entry into MODE 3 of 9 hours. ITS 3.1.6 ACTION B states that if any Required Action and associated CT of Condition A (one APSR not within alignment limits) is not met, the unit must be in MODE 3 within 6 hours. The shortest CT in ITS 3.1.6 ACTION A is 2 hours. Therefore, under the ITS, the shortest possible time from discovery of the condition to entry into MODE 3 is 8 hours. This changes the CTS by providing one less hour for entry into MODE 3 following discovery of a misaligned APSR if Required Actions are not met.	3.1.6 ACTION B	3.1.3.2 Action 3.0.3
3.1.7 M01	CTS 3.1.3.3 Action a covers the inoperabilities for a maximum of one absolute position indicator channel per CR group or one relative position indicator channel per CR group and CTS 3.1.3.3 Action a.1 requires the reduction in THERMAL POWER to ≤ 60 percent of the THERMAL POWER allowable for the RCP combination and a reduction of the High Flux Trip Setpoint to ≤ 70 percent of the THERMAL POWER allowable for the RCP combination within 8 hours. ITS 3.1.7 does not include this option to reduce THERMAL POWER and to reduce the High Flux Trip Setpoint. This changes the CTS by deleting the allowance to reduce THERMAL POWER and the High Flux Trip Setpoint.	None	3.1.3.3 Action a.1

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.7 M02	CTS 3.1.3.3 Action a.2.a requires the position of the CR with the inoperable position indicator to be verified within 8 hours by actuating one of the position reference indicators and CTS 3.1.3.3 Action a.2.b requires the CR group(s) containing the inoperable position indicator channel to be verified to be maintained at the position reference indicators at least once per 12 hours thereafter. ITS 3.1.7 ACTION B includes the same requirements however the CT of 12 hours has been changed to 8 hours. This changes the CTS by requiring the Action to be performed more frequently.	3.1.7 ACTION B	3.1.3.3 Actions a.2.a and a.2.b
3.1.7 M03	CTS 3.1.3.3 Action a.2.c requires verification that operation is with the limits in Specification 3.1.3.5 (Safety Rod Insertion Limit), Specification 3.1.3.6 (Regulating Rod Insertion Limits), and Specification 3.1.3.9 (Axial Power Shaping Rod Insertion Limits). CTS 3.1.3.3 Action a.1 requires this verification within 8 hours. ITS 3.1.7 Required Action B.1.2 requires the same verification however a CT of 8 hours and once per 8 hours thereafter is specified. This changes the CTS by adding the CT of "once per 8 hours."	3.1.7 Required Action B.1.2	3.1.3.3 Actions a.1 and a.2.c
3.1.7 M04	CTS 3.1.3.3 Action b covers the inoperabilities for more than one relative position indicator channel per CR group and requires verification that the absolute position indicators channels for the affected control rod assemblies are OPERABLE. ITS 3.1.7 ACTION A covers inoperabilities for the relative position indicator channels for one or more rods and it requires the determination that the absolute position indicator channel for the rod(s) is OPERABLE within 8 hours and once per 8 hours thereafter. This changes the CTS by adding specific CT to verify the absolute position indicator channels are OPERABLE.	3.1.7 ACTION A	3.1.3.3 Action b

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.7 M05	CTS 3.1.3.3 does not contain an Action to follow if the provided Actions cannot be met and does not provide an Action to follow with both absolute and relative position indicator channels inoperable for one or more rods. Therefore, CTS 3.0.3 would be entered, which would allow 1 hour to initiate a shutdown and to be in HOT STANDBY within 7 hours. ITS 3.1.7 contains ACTION C, which states that the plant must immediately declare the rod(s) inoperable. For CRs (regulating rods and safety rods) this will require entry into ITS 3.1.4 ACTION D and the plant is required to verify SDM is within limits or initiate boration to restore SDM to with limit within one hour and to be in MODE 3 within 6 hours. This changes the CTS by eliminating the one hour to initiate a shutdown and, consequently, allowing one hour less for the unit to be in MODE 3 and adds the SDM requirements.	3.1.7 ACTION C	3.1.3.3 3.0.3
3.1.8 M01	CTS 3.10.1 Action specifies requirements for when Specification 3.2.2 (F_Q) or Specification 3.2.3 ($F^N_{\Delta H}$) limits are exceeded and requires a reduction in THERMAL POWER sufficiently to satisfy the ACTION requirements of Specifications 3.2.2 and 3.2.3 or to be in at least MODE 3 within 6 hours. ITS 3.1.8 Required Action B.1 requires the PHYSICS TEST exception to be suspended within 1 hour. This changes the CTS by replacing the current Action with a requirement to suspend the PHYSICS TESTS exceptions within 1 hour.	3.1.8 Required Action B.1	3.10.1 Action

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.8 M02	CTS 3.10.1 does not provide any Actions for when the requirements of LCO 3.10.1.a (the THERMAL POWER limitation) or LCO 3.10.1.b (the High Flux Trip Setpoint limitation) are not met. ITS 3.1.8 includes ACTION B that, in part, includes a Condition to cover THERMAL POWER > 85 percent RTP, High Flux trip setpoint > 10 percent higher than PHYSICS TESTS power level, and High Flux trip setpoint > 90 percent RTP. ITS 3.1.8 Required Action B.1 requires the suspension of PHYSICS TESTS exception within 1 hour. This changes the CTS by imposing an additional requirement on the application of the test exception LCO.	3.1.8 ACTION B	None
3.1.8 M03	CTS 3.10.1.a requires THERMAL POWER to be maintained ≤ 85 percent RTP, however there is no SR associated with this requirement. CTS 3.1.1.1 requires SDM to be within limit, however the only SR in MODE 1 is to verify the regulating rod groups are within the insertion limits. ITS SR 3.1.8.1 requires a verification that THERMAL POWER is ≤ 85 percent RTP every hour and ITS SR 3.1.8.3 requires SDM to be with limits every 24 hours. This changes the CTS by adding two additional SRs.	SR 3.1.8.1 SR 3.1.8.3	None
3.1.8 M04	CTS 3.1.1.1 Action does not provide any specific requirements to suspend PHYSICS TESTS when SDM is not met. ITS 3.1.8 Required Action A.1 requires suspension of the PHYSICS TEST exception within 1 hour. This changes the CTS by imposing an additional requirement on the application of the test exception LCO.	3.1.8 Required Action A.1	None
3.1.8 M05	CTS 3.10.1 allows the requirements of Specification 3.1.3.6 (the regulating rod group insertion limits) to be suspended during PHYSICS TESTS. ITS LCO 3.1.8 only requires the regulating rod insertion limits associated with the restricted region to be suspended. This changes the CTS by imposing an additional requirement on the application of the test exception LCO.	3.1.8	3.10.1

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.9 M01	CTS 3.10.2 does not provide any Actions for when the requirements of LCO 3.10.2.b (the High Flux channel trip setpoint limitation) or LCO 3.10.2.c (the nuclear instrumentation high startup rate CR withdrawal inhibit OPERABILITY requirement) are not met. ITS 3.1.9 ACTION D includes a Condition to cover the High Flux trip setpoint not within limit and nuclear instrumentation high startup rate CR withdrawal inhibit inoperable. ITS 3.1.9 Required Action D.1 requires the suspension of PHYSICS TESTS exception within 1 hour. This changes the CTS by imposing an additional requirement on the application of the test exception LCO.	3.1.9 ACTION D	None
3.1.9 M02	CTS 3.1.1.1 requires SDM to be within limit, however the SRs in MODE 2 are to verify the regulating rod groups are within the insertion limits every 12 hours and to verify within 4 hours prior to achieving reactor criticality predicted CR position is within limit of CTS 3.1.3.6. ITS SR 3.1.9.4 requires SDM to be with limits every 24 hours. This changes the CTS by adding an additional SR.	SR 3.1.9.4	None
3.1.9 M03	CTS 3.1.1.1 Action does not provide any specific requirements to suspend PHYSICS TESTS when SDM is not met. ITS 3.1.9 Required Action B.2 requires suspension of the PHYSICS TEST exception within 1 hour. This changes the CTS by imposing an additional requirement on the application of the test exception LCO.	3.1.9 Required Action B.2	None

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.9 M04	CTS 3.10.2 allows the requirements of CTS 3.1.3.6 (Regulating Rod Insertion Limits) to be suspended during performance of PHYSICS TESTS when in MODE 2. This includes the sequence and overlap limits as well as the insertion limits for both the restricted operation region and the unacceptable operation region. ITS 3.1.9 does not allow suspension of the LCO 3.2.1 insertion limits for the unacceptable operation region; only the insertion limits for the restricted operation region and the sequence and overlap limits are allowed to be suspended. This changes the CTS by deleting the allowance to suspend the regulating rod insertion limits for the unacceptable operation region during PHYSICS TESTS in MODE 2.	3.1.9	3.10.2
3/4.10.3 M01	CTS 3/4.10.3 provides an exception to the reactor coolant loop requirements in CTS 3.4.1 in MODE 2 for the purpose of the performance of STARTUP and PHYSICS TEST provided the THERMAL POWER does not exceed 5 percent RTP and the reactor trip setpoints on the OPERABLE High Flux channels are set <25 percent RTP. According to the Bases, this special test exception permits reactor criticality under various flow conditions and is required in order to perform certain startup and PHYSICS TESTS while at low THERMAL POWER levels. The ITS does not contain this special test exception. This changes the CTS by eliminating a special test exception.	None	3/4.10.3

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3/4.10.4 M01	CTS 3/4.10.4 provides an exception to the SDM requirements in CTS 3.1.1.1 in MODE 2 for the purpose of measurement of CR worth and SDM provided the reactivity equivalent to at least the highest estimated CR worth is available for trip insertion from OPERABLE CR(s). According to the Bases, this special test exception is required to permit the periodic verification of the actual versus predicted core reactivity condition occurring as a result of fuel burnup or fuel cycling operations. The ITS does not contain this special test exception. This changes the CTS by eliminating a special test exception.	None	3/4.10.4
3.2.1 M01	CTS 3.1.3.6 require the regulating rod groups to be positioned within acceptable limits during operations in MODES 1 and MODE 2 with keff ≥ 1.0. CTS 3.1.1.1 requires SDM to be met in MODES 1 and MODE 2 however CTS 4.1.1.1.1.b only requires a verification that SDM is within limits by verifying that regulating rod groups withdrawal is within limits in MODE 1 and MODE 2 with keff ≥ 1.0. ITS 3.2.1 requires the regulating rod insertion limits to apply at all times in MODES 1 and 2 and ITS SR 3.2.1.1 and SR 3.2.1.2 require verification in these modes. This changes the CTS by expanding the applicability of the regulating rod groups and requires verification to include MODE 2 with keff < 1.0.	3.2.1 SR 3.2.1.1 SR 3.2.1.2	3.1.3.6 3.1.1.1 4.1.1.1.1.b
3.2.2 M01	The Applicability of CTS 3.1.3.9 is MODE 1 and MODE 2 with the Applicability in MODE 2 modified by a footnote, designated as "#," stating "With keff ≥ 1.0." ITS 3.2.2 Applicability is MODE 1 and 2. The CTS is revised to delete the footnote.	None	3.1.3.9 Applicability footnote #

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.4 M01	CTS 3.2.4 Action a.2, Action b.2, and Action c.1 do not provide any default actions to exit the Applicability of the Specification if any of the Required Actions are not met. If those actions are not complete, CTS 3.0.3 would be entered requiring entry into Hot Standby (MODE 3) within 7 hours. However, since the Applicability of CTS 3.2.3 is MODE 1 with THERMAL POWER > 15 percent RTP, the power reduction would only be to 15 percent RTP. ITS 3.2.4 ACTION D requires a THERMAL POWER reduction to 20 percent RTP within 2 hours. This changes the CTS by requiring THERMAL POWER to be reduced to outside of the Applicability of the Specification from 7 hours to 2 hours. The change from 15 percent RTP to 20 percent RTP is discussed in DOC L01.	3.2.4 ACTION D	3.2.4 Actions a.2, b.2, and c.1 3.0.3
3.2.5 M01	CTS 3.2.3 Action a requires a reduction of THERMAL POWER at least 1 percent for each 1 percent $F^N_{\Delta H}$ exceeds the limit and a similar reduction in the High Flux and Flux-ΔFlux-Flow Trip Setpoints. ITS 3.2.5 Required Actions B.1 and B.2 require a reduction of THERMAL POWER and a reduction of the High Flux and Flux-ΔFlux-Flow Trip Setpoints of ≥ RH (percent) RTP for each 1 percent that $F^N_{\Delta H}$ exceeds the limit. This changes the CTS by requiring THERMAL POWER and the High Flux and Flux-ΔFlux-Flow Trip Setpoints be reduced by RH (percent) RTP for each 1 that $F^N_{\Delta H}$ exceeds the limit instead of by 1 percent for each 1 percent that $F^N_{\Delta H}$ exceeds the limit.	3.2.5 Required Actions B.1 and B.2	3.2.3 Action a

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M01	CTS Table 3.3-1 Functional Unit 2 only requires the High Flux channels to be OPERABLE in MODES 1 and 2. CTS Table 3.3-1 Functional Unit 6 only requires the RC High Pressure channels to be OPERABLE in MODES 1 and 2. ITS 3.3.1 Table 3.3.1-1 Function 1.a, in part, requires the High Flux - High Setpoint channels to be OPERABLE in MODE 3 with any CRD trip breaker in the closed position, the CRD System capable of rod withdrawal, and not in shutdown bypass operation (Footnote b). ITS Table 3.3.1-1 Function 3, in part, requires the RC High Pressure channel to be OPERABLE in MODE 3 with any CRD trip breaker in the closed position, the CRD System capable of rod withdrawal, and not in shutdown bypass operation (Footnote b). This changes the CTS by expanding the Applicability of the LCOs.	Table 3.3.1-1 footnote (b)	Table 3.3-1
3.3.1 M02	CTS Table 3.3-1 Functional Unit 9 only requires the Containment High Pressure channels to be OPERABLE in MODES 1 and 2. ITS Table 3.3.1-1 Function 6 requires the channels to be OPERABLE in MODES 1, 2, and MODE 3 with any CRD trip breaker in the closed position and the CRD System capable of rod withdrawal (Table 3.3.1-1 Footnote (g). This changes the CTS by expanding the Applicability of the RPS Containment High Pressure channels.	Table 3.3.1-1 footnote (g)	Table 3.3-1

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M03	CTS Table 3.3-1 Functional Unit 14 (Shutdown Bypass High Pressure) requires entry into ACTION 6. ACTION 6 states, "With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement, verify compliance with the SDM requirements of Specification 3.1.1.1 within one hour and at least once per 12 hours thereafter. CTS Table 3.3-1 specifies the Minimum Channel requirement to be 3. ITS LCO 3.3.1 and ITS Table 3.3.1-1 Function 11 requires 4 channels of the Shutdown Bypass High Pressure Function to be OPERABLE. ITS 3.3.1 ACTION A requires entry when one channel is inoperable and requires the channel to be placed in bypass or trip within one hour. This changes the CTS by increasing the required channels to be OPERABLE from "3" to "4" and adds an Action to the Technical Specifications.	Table 3.3.1-1	Table 3.3-1
3.3.1 M04	CTS Table 3.3-1 does not provide any actions for three or more inoperable channels and does not provide Required Actions to place the unit outside of the Applicability if the specified Actions are not met (CTS Table 3.3-1 ACTIONS 2, 3, and 6). Entry into CTS 3.0.3 is since no actions are specified. CTS 3.0.3 allows 1 hour to required initiate action and 6 additional hours for the unit to be placed in MODE 3. ITS 3.3.1 ACTION C requires entry when three or more channels are inoperable and requires entry into the Condition referenced in Table 3.3.1-1 for the Function. ITS Table 3.3.1-1 references ITS 3.3.1 ACTION D and E. ITS 3.3.1 ACTION D requires the plant to be in MODE 3 with all control rod drive (CRD) trip breakers open within 6 hours. ITS 3.3.1 ACTION E requires the plant to open all CRD trip breakers within 6 hours. This changes the CTS by providing a specific default condition instead of requiring entry into CTS 3.0.3, reduces the time to reach the applicable condition from 7 hours to 6 hours, and requires the plant to open all the CRD trip breakers.	ITS ACTIONS D and E	Table 3.3-1

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M05	CTS Table 4.3-1 Functional Unit 2 requires a daily CHANNEL CALIBRATION of the High Flux instrumentation. CTS Table 4.3-1 Note 2 specifies, in part, that the Surveillance consists of a "Heat Balance only, above 15 percent of RATED THERMAL POWER [RTP]." CTS Table 4.3-1 Functional Unit 4 requires a monthly CHANNEL CALIBRATION of the Flux - ΔFlux - Flow instrumentation, however CTS Table 4.3-1 Note 3 requires the test to be performed above 50 percent RTP and requires a comparison of out-of-core measured AXIAL POWER IMBALANCE to incore measured AXIAL POWER IMBALANCE. ITS SR 3.3.1.2 requires a comparison of the results of calorimetric heat balance calculation to the power range channel output every 24 hours. This Surveillance contains a Note (Note 2) that states that it is not required to be performed until 24 hours after THERMAL POWER is ≥15 percent RTP. ITS SR 3.3.1.4 requires a comparison of the results of the out of core measured AXIAL POWER IMBALANCE to incore measured AXIAL POWER IMBALANCE every 31 days. This Surveillance contains a Note (Note 2) that states that it is not required to be performed until 24 hours after THERMAL POWER is ≥ 50 percent RTP. This changes the CTS by explicitly specifying the time required to perform the Surveillance after entering the specified Applicability.	SR 3.3.1.2 SR 3.3.1.4	Table 4.3-1
3.3.1 M06	CTS Table 4.3-1 Functional Unit 2 requires a CHANNEL CALIBRATION of the High Flux channels. CTS Table 4.3-1 Note 2 specifies, in part, that the Surveillance consists of a "Heat Balance only." ITS SR 3.3.1.2 requires a comparison of the results of calorimetric heat balance calculation to the power range channel output. This Surveillance contains a Note (Note 1) that states that the power range channel output must be adjusted if the absolute difference exceeds the established limits. This changes the CTS by specifying an acceptance criterion for when the power range channels are required to be adjusted.	SR 3.3.1.2	Table 4.3-1

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M07	CTS Table 3.3-1 Functional Unit 2 only requires the High Flux channels to be OPERABLE in MODES 1 and 2. CTS Table 3.3-1 Note a requires the High Flux Trip Setpoint to be reduced to ≤ 5 percent RTP and the Shutdown Bypass High Pressure Trip Setpoint of ≤ 1820 psig to be imposed when in shutdown bypass operation. ITS Table 3.3.1-1 Function 1.b requires the High Flux - Low Setpoint to be OPERABLE in MODES 2, 3, 4, and 5 during shutdown bypass operation with any CRD trip breaker in the closed position and the CRD System capable of rod withdrawal (ITS Table 3.3.1-1 Footnote (f)). This changes the CTS by expanding the Applicability requirements for the High Flux Trip Setpoint -Low Function when operating during shutdown operation in MODES 3, 4, and 5.	Table 3.3.1-1 footnote (f)	Table 3.3-1 Note a
3.3.2 M01	CTS Table 3.3-1 does not provide any actions for two inoperable Manual Reactor Trip channels, thus entry into CTS 3.0.3 is required. CTS 3.0.3 allows 1 hour to initiate action and 6 additional hours for the unit to be placed in MODE 3. ITS 3.3.2 ACTION B requires entry when two Manual Reactor Trip channels are inoperable and requires the restoration of one Manual Reactor Trip channel to OPERABLE status within 1 hour. ITS 3.3.2 ACTION C requires entry when ACTION B is not met during MODES 1, 2, and 3 and requires the plant to be in MODE 3 with the CRD trip breakers open within 6 hours. ITS 3.3.2 ACTION D requires entry when ACTION B is not met during MODES 4 and 5 and requires the CRD trip breakers to be opened within 6 hours. This changes the CTS by providing a specific default condition instead of requiring entry into CTS 3.0.3 when two RPS Manual Reactor Trip channels are inoperable and requires all CRD trip breakers to be opened within 7 hours.	3.3.2 ACTIONS B, C, and D	Table 3.3-1

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.3 M01	CTS Table 3.3-1 Action 7 covers the condition when one RTM is inoperable and requires the placement of the inoperable channel in the trip condition or the removal of power supplied to the CRD trip device associated with the inoperable channel within one hour. ITS 3.3.3 ACTION A requires the associated CRD trip breaker to be tripped or to remove power from the associated CRD trip breaker and to physically remove the inoperable RTM. This changes the CTS by providing an additional Required Action to remove the inoperable RTM and provides an action to trip the CRD breaker instead of just tripping the channel (i.e., module).	3.3.3 ACTION A	Table 3.3-1 Action 7

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.3 M02	CTS Table 3.3-1 requires entry into ACTION 7 if one channel is inoperable and does not provide any actions for two or more inoperable channels. If the requirements of the CTS Table 3.3-1 ACTION 7 are not met or if two or more channels are inoperable, entry into CTS 3.0.3 is required since no actions are specified. CTS 3.0.3 allows 1 hour to initiate action and 6 additional hours for the unit to be placed in MODE 3. ITS 3.3.3 ACTION B, which is applicable if any Required Action and associated CT of Condition A is not met in MODE 1, 2, or 3 or when two or more RTMs are inoperable in MODE 1, 2, and 3, requires the unit to be placed in MODE 3 within 6 hours and to either open all CRD trip breakers or remove power from all CRD trip breakers within 6 hours. ITS 3.3.3 ACTION C, which is applicable if any Required Action and associated CT of Condition A is not met in MODE 4 or 5 or when two or more RTMs are inoperable in MODE 4 or 5, requires either all CRD trip breakers to be opened or power to be removed from all CRD trip breakers within 6 hours. This changes the CTS by providing a specific default Condition and Required Actions instead of requiring entry into CTS 3.0.3 when the actions for one inoperable channel are not met or when two or more channels are inoperable and reduces the time to reach MODE 3 from 7 hours to 6 hours. It also adds Required Actions to open all CRD trip breakers or to remove power to all CRD trip breakers.	3.3.3 ACTIONS B, C	Table 3.3-1 Action 7

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.4 M01	CTS Table 3.3-1 Functional Unit 12 requires entry into ACTION 7 when one CRD Trip Breaker is inoperable and requires the CRD Trip Breaker to be placed in the trip condition within 1 hour or to remove power supplied to the CRD trip device associated with the inoperative channel. CTS Table 3.3-1 Functional Unit 12 requires entry into ACTION 8 when one of the CRD Trip Breaker diverse trip features (undervoltage or shunt trip devices) is inoperable and requires the restoration of the device within 48 hours or to place the breaker in the tripped condition within 1 hour. If any of these Actions are not met, CTS 3.0.3 would be entered requiring entry into Hot Standby (MODE 3) within 7 hours, Hot Shutdown (MODE 4) within 13 hours, and Cold Shutdown (MODE 5) within 37 hours, as applicable. ITS 3.3.4 ACTION C requires entry if in MODE 1, 2, or 3 with any Required Action and associated CT not met and it requires the unit must be in MODE 3 within 6 hours with all CRD trip breakers open or with power removed from all CRD trip breakers. ITS 3.3.4 ACTION D requires entry if in MODE 4 or 5 with any Required Action and associated CT not met and it requires the unit to open all CRD trip breakers or power must be removed from all CRD trip breakers within 6 hours. This changes the CTS by requiring the unit to be in MODE 3 in 6 hours instead of 7 hours and requires all CRD trip breakers to be tripped or to remove power from each CRD trip breaker within 6 hours if the ACTIONS for one or more CRD trip breakers could not be performed.	3.3.4 ACTIONS C and D	Table 3.3-1 Functional Unit 12 Actions 7 and 8

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.4 M02	CTS Table 3.3-1 Functional Unit 12 requires entry into ACTION 8 when one of the CRD Trip Breaker diverse trip features (undervoltage or shunt trip devices) is inoperable and ACTION 8 requires restoring the device within 48 hours or placing the breaker in the tripped condition within the next hour. ITS 3.3.4 Required Action A.1 requires the inoperable CRD trip breaker to be placed in trip condition within 48 hours. It does not include a requirement to restore the trip device. This changes the CTS by reducing the CT to place the breaker in trip from 49 hours to 48 hours and deleting an ACTION that is not necessary to include in the ITS.	3.3.4 ACTION A	Table 3.3-1 Functional Unit 12 Action 8
3.3.5 M01	CTS Table 3.3-3 Instrument String b (Containment Pressure - High), Instrument String c (Containment Pressure - High High), and Instrument String f (borated water storage tank (BWST) Level - Low Low) only require the units to be OPERABLE in MODES 1, 2, and 3. CTS Table 4.3-2 includes the same Applicability for the Surveillances. ITS 3.3.5 Table 3.3.5-1 Parameters 3, 4 and 5 require the same channels to be OPERABLE in MODES 1, 2, 3, and 4. This changes the CTS by expanding the Applicability of the three Parameters.	Table 3.3.5-1 Parameters 3, 4, and 5	Table 3.3-3 Instrument strings b, c, and f

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.5 M02	CTS Table 3.3-3 ACTION 10 does not provide any actions if the specified Action (ACTION 10) is not met or if more than one channel is inoperable. Entry into CTS 3.0.3 is required since no actions are specified. CTS 3.0.3 allows 1 hour to prepare for shutdown of the unit, and requires the unit to be in MODE 3 within 7 hours and MODE 5 within 37 hours. ITS 3.3.5 ACTION B requires the unit to be in MODE 3 within 6 hours, if the RCS Pressure - Low channels are inoperable to also reduce RCS pressure to < 1800 psig within 36 hours, if the RCS Pressure - Low Low channels are inoperable to also reduce RCS pressure to < 660 psig within 36 hours, and if the Containment Pressure - High and Containment Pressure - High High channels are inoperable to be in MODE 5 within 36 hours. This changes the CTS by providing a specific default condition instead of requiring entry into CTS 3.0.3 and reduces the time to reach the applicable conditions.	3.3.5 ACTION B	Table 3.3-3 Action 10
3.3.8 M01	CTS Tables 3.3-3 and 4.3-2 requirements for the Degraded Voltage and Loss of Voltage Functional Units are applicable in MODES 1, 2, 3, and 4. ITS 3.3.8 requires the Degraded Voltage and Loss of Voltage Functions to be OPERABLE in MODES 1, 2, 3, and 4 and when the associated EDG is required to be OPERABLE by LCO 3.8.2, "AC Sources - Shutdown." This changes the CTS by expanding the conditions under which the Degraded Voltage and Loss of Voltage Functions must be OPERABLE.	3.3.8	Table 3.3-3 and 4.3-2 Functional Unit 4

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.8 M02	CTS Table 3.3-3 Action 15a allows a loss of voltage or degraded voltage channel per bus to be inoperable and bypassed for up to 2 hours to perform Surveillance testing per Specification 4.3.2.1.1 (i.e., a CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION). ITS 3.3.8 includes this allowance as a Note to the Surveillances, but restricts its use to only one channel per Function. This changes the CTS by changing an allowance to bypass, for 2 hours, one channel per bus made inoperable solely to perform Surveillance testing to only one channel per Function.	SRs Note	Table 3.3-3 Action 15a
3.3.9 M01	CTS Table 3.3-1 "MINIMUM CHANNELS OPERABLE" column only requires one Source Range, Neutron Flux and Rate channel to be OPERABLE in MODES 3, 4, and 5. Furthermore, CTS Table 3.3-1 ACTION 6, which is the ACTION referenced in Table 3.3-1 for the Source Range, Neutron Flux and Rate Functional Unit in MODES 3, 4, and 5, is only applicable when the number of channels OPERABLE is one less than required by the Minimum Channels OPERABLE requirement. Thus, while the CTS Table 3.3-1 states that the Source Range Neutron Flux Functional Unit includes "2" in the Total Number Of Channels column, only 1 channel is required to be OPERABLE by CTS 3.3-1. ITS LCO 3.3.9 requires two source range neutron flux channels to be OPERABLE in MODES 3, 4, and 5. In addition, ITS 3.3.9 ACTION A provides the requirements when one of the two channels are inoperable, and requires the inoperable channel to be restored to OPERABLE status prior to increasing neutron flux. This changes the CTS by requiring an additional source range neutron flux monitoring channel to be OPERABLE in MODES 3, 4, and 5, and provides an appropriate Action when the additional channel is inoperable.	3.3.9, 3.3.9 ACTION A	Table 3.3-1, Table 3.3-1 Action 6

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.9 M02	CTS Table 3.3-1 Functional Unit 11.A provides requirements for source range instrumentation in MODE 2. Two channels are required to be OPERABLE however there are no compensatory actions provided with two channels inoperable. ITS 3.3.9 ACTION B requires the immediate suspension of operations involving positive reactivity changes and the immediate initiation of actions to insert all CRS and within one hour to open CONTROL ROD (CRD) trip breakers and to verify SDM is within limit. In addition there is a requirement to verify SDM once per 12 hours thereafter. This changes the CTS by providing specific actions for two inoperable source range channels.	3.3.9 ACTION B	Table 3.3-1 Functional Unit 11.A
3.3.9 M03	CTS Table 3.3-1 Functional Unit 11.B provides requirements for source range neutron flux instrumentation during shutdown. One channel is required to be OPERABLE and if one channel is inoperable CTS Table 3.3-1 ACTION 6 requires the verification of compliance with the SDM within one hour and at least once per 12 hours thereafter. ITS 3.3.9 includes the same requirement however it also requires the immediate suspension of operations involving positive reactivity changes and the immediate initiation of actions to insert all CRS, and within one hour to open CRD trip breakers and to verify SDM is within limit. This changes the CTS by providing additional compensatory actions for two inoperable source range channels during shutdown conditions.	3.3.9 ACTION B	Table 3.3-1 Action 6

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.10 M01	CTS Table 3.3-1 Functional Unit 10 provides requirements for intermediate range neutron flux instrumentation. Two channels are required to be OPERABLE and if one channel is inoperable CTS Table 3.3-1 ACTION 4 requires the inoperable channel to be restored to OPERABLE status prior to increasing THERMAL POWER above 5 percent RTP (MODE 1). ITS 3.3.10 ACTION A requires the reduction in neutron flux to < 10E-10 amp within two hours. If this is not met ITS 3.3.10 ACTION B requires the immediate suspension of operations involving positive reactivity changes and within one hour to open CRD trip breakers. This changes the CTS by requiring a reduction of neutron flux within 2 hours instead of not allowing a THERMAL POWER increase above 5 percent RTP and adds a requirement to suspend operations involving positive reactivity changes and to open CRD trip breakers.	3.3.10 ACTIONS A and B	Table 3.3-1 Action 4
3.3.10 M02	CTS Table 3.3-1 Functional Unit 10 provides requirements for intermediate range neutron flux instrumentation. Two channels are required to be OPERABLE and if one channel is inoperable CTS Table 3.3-1 ACTION 4 provides a compensatory action. The CTS does not provide compensatory actions for two inoperable intermediate range neutron flux instrumentation channels. ITS 3.3.10 ACTION B requires the immediate suspension of operations involving positive reactivity changes and within one hour to open CRD trip breakers. Plant temperature changes are allowed provided the temperature change is accounted for in the calculated SDM. This changes the CTS by adding specific actions for two inoperable intermediate range neutron flux channels.	3.3.10 ACTION B	Table 3.3-1 Action 4

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.10 M03	The Minimum Channels Operable requirement in CTS Table 3.3-1 for the Intermediate Range Neutron Flux channels is modified by Note (c) that states that the minimum channels OPERABLE requirement many be reduced to one when Specification 3.10.1 or 3.10.2 is in effect. ITS 3.3.10 does not contain the Note or a reference to the Special Test Exceptions. Thus, two intermediate range channels will now be required during these special test exceptions. This changes the CTS by requiring additional Intermediate Range Neutron Flux channels to be OPERABLE during Special Test Exceptions.	Table 3.3-1 Note (c)	None
3.3.11 M01	CTS Table 3.3-3 Action 16 does not provide any actions if the specified Action (Action 10) is not met or if two or more channels are inoperable. Entry into CTS 3.0.3 is required since no actions are specified. CTS 3.0.3 allows 1 hour to prepare for shutdown of the unit, and requires the unit to be in MODE 3 within 7 hours, and MODE 4 within 13 hours. ITS 3.3.11 ACTION B requires the unit to be in MODE 3 within 6 hours, below a steam line pressure of 750 psig within 12 hours for a Steam Line Pressure-Low channel, and in MODE 4 in 12 hours for all other channels. This changes the CTS by providing a specific default condition instead of requiring entry into CTS 3.0.3 and reduces the time to reach the applicable conditions.	3.3.11 ACTION B	Table 3.3-3 Action 16

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.11 M02	CTS Table 3.3-12 Functional Unit 1, Steam Line Pressure-Low, specifies an AV of ≥ 591.6 psig for the CHANNEL FUNCTIONAL TEST and ≥ 586.6 psig for the CHANNEL CALIBRATION. CTS Table 3.3-12 Functional Unit 2, Steam Generator (SG) Level-Low, specifies an Allowable Value (AV) of ≥ 16.9 inches for the CHANNEL FUNCTIONAL TEST. CTS Table 3.3-12 Functional Unit 3, SG Feedwater (FW) Differential Pressure-High, specifies an Allowable Value of ≤ 197.6 psid for the CHANNEL FUNCTIONAL TEST and ≤ 199.6 psid for the CHANNEL CALIBRATION. ITS Table 3.3.11-1 Functions 1, 3, and 2 specify AVs of ≥ 600.2 psig, ≥ 17.3 inches, and ≤ 176.8 psid, respectively. This changes the CTS by changing the AVs for these three Functional Units.	Table 3.3.11-1 Functions 1, 2, and 3	Table 3.3-12 Functional Units 1, 2, and 3
3.3.11 M03	CTS Table 4.3-11 Functional Unit 1.a (Steam Line Pressure – Low), Functional Unit 1.b (SG Level – Low), and Functional Unit 1.c (SG – FW Differential Pressure – High) AVs have been changed as described in DOC M02 and have been determined to be limiting safety system setting (LSSS) that protect against violation of safety limits. Currently, the CTS does not include any requirements if the AV is met, but is outside the trip setpoint limits. ITS Table 3.3.11-1 Function 1 (Main Steam Line Pressure – Low), Function 2 (FW/SG Differential Pressure – High), and Function 3 (SG Level Low) include two notes (Notes (b) and (c)) to the CHANNEL FUNCTIONAL TEST and the CHANNEL CALIBRATION Surveillances to verify Limiting Trip Setpoints (LSSS). This changes the CTS by adding requirements to verify the LSSS in accordance with setpoint – related Technical Specifications that are acceptable to the NRC.	Table 3.3.11-1 Functions 1, 2, and 3 Notes (b) and (c)	None

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.12 M01	CTS Table 3.3-11 Action 17 requires the unit to be in MODE 3 within 6 hours and MODE 5 within the following 30 hours if Functional Unit 5 channels are not restored within the 48 hour CT. However, CTS Table 3.11-1 Functional Unit 5 is applicable only in MODES 1, 2, and 3. Thus, as described in CTS 3.0.1, CTS Table 3.3-11 Action 17 is only applicable in MODES 1, 2, and 3 for Functional Unit 5. ITS 3.3.12 ACTION B is the associated shutdown action for the above Function, and it only requires the unit to be in MODE 3 within 6 hours and MODE 4 within 12 hours. This changes the CTS by explicitly specifying that the unit is only required to be shut down to MODE 4, and that it must be performed within 12 hours, not 36 hours.	3.3.12 ACTION B	Table 3.3-11 Action 17

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.13 M01	CTS Table 3.3-11 Functional Unit 1 identifies that there are 8 pressure switches of Main Steam Pressure Low Instrument Channels. It also identifies that 4 of these switches are associated with Channel 1 (i.e., actuation channel 1) and that 4 of these switches are associated with Channel 2 (i.e., actuation channel 2). CTS Table 3.3-11 Functional Unit 2 identifies that there are 8 differential pressure switches of FW/SG Differential Pressure – High Instrument Channels. It also identifies that 4 of these switches are associated with Channel 1 (i.e., actuation channel 1) and that 4 of these switches are associated with Channel 2 (i.e., actuation channel 2). CTS Table 3.3-11 Functional Unit 3 identifies that there are 8 LSLL of SG Level - Low Instrument Channels. It also identifies that 4 of these LSLL are associated with Channel 1 (i.e., actuation channel 1) and that 4 of these LSLL are associated with Channel 2 (i.e., actuation channel 2). CTS Table 3.3-11 Functional Unit 4 requires the Loss of RCP Channels to be OPERABLE. CTS Table 3.3-11 requires a minimum of 2 channels (i.e., actuation channels) to be OPERABLE. ITS LCO 3.3.13 requires Channels 1 and 2 of the Main FW Isolation, the Main Steam Line Isolation, the Auxiliary Feedwater (AFW) Initiation, and the AFW and Main Steam Valve Control Actuation Functions to be OPERABLE. This changes CTS by specifying the Actuation Functions to be OPERABLE. Requirements for the steam and feedwater rupture control system (SFRCS) instrumentation channel are discussed in the Discussion of Changes for ITS 3.3.11.	3.3.13	Table 3.3-11 Functional Units 1,2, 3, and 4
3.3.13 M02	CTS Table 3.3-11 Functional Units 1 through 4 include a Note # that applies to Action 16 that states the provisions of Specification 3.0.4 are not applicable. ITS 3.3.13 does not include this Note. This changes the CTS by deleting the specific exception to Specification 3.0.4.	None	Table 3.3-11 Action 16 Note #

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.13 M03	CTS Table 3.3-11 Action 16 provides the compensatory actions to take when one channel is inoperable. If CTS Table 3.3-11 Action 16 is not met, entry into CTS 3.0.3 is required since no further actions are specified. CTS 3.0.3 allows 1 hour to initiate action, 7 hours for the unit to be placed in MODE 3 and 13 hours for the unit to be in MODE 4. ITS 3.3.11 ACTION B requires the unit to be placed in MODE 3 in 6 hours and MODE 4 in 12 hours. This changes the CTS by providing a specific default condition instead of required entry into CTS 3.0.3, and reducing the time allowed to reach the applicable conditions.	3.3.11 ACTION B	Table 3.3-11 Action 16
3.3.14 M01	CTS 3.3.3.1 Action a allows the alarm/trip setpoint of Table 3.3-6 to exceed the setpoint for 4 hours and then to declare the channel inoperable. ITS 3.3.14 requires the channel to be declared inoperable immediately when the channel is inoperable. This changes the CTS by deleting the 4 hour allowance to declare a channel inoperable.	3.3.14	3.3.3.1 Action a
3.3.14 M02	CTS Table 3.3-6 requires one Fuel Storage Pool Area Emergency Ventilation System Actuation Function channel to be OPERABLE. ITS LCO 3.3.14 requires two channels to be OPERABLE. This changes the CTS by increasing the channels required to be OPERABLE from one to two.	3.3.14	Table 3.3-6

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.15 M01	CTS 3.7.6.1 does not provide any actions for when CTS 3.7.6.1 Actions b and c are not met. Entry into CTS 3.0.3 is required since no actions are specified. CTS 3.0.3 allows 1 hour to initiate action and 6 additional hours for the unit to be placed in HOT STANDBY (MODE 3), the following 6 hours to be in HOT STANDBY (MODE 4), and the subsequent 24 hours to be in COLD SHUTDOWN (MODE 5). ITS 3.3.15 ACTION C requires entry when the Required Action and associated CT is not met and requires the plant to be in MODE 3 within 6 hours and MODE 5 within 36 hours. This changes the CTS by providing a specific default condition instead of requiring entry into CTS 3.0.3, reduces the time to reach MODE 3 (from 7 hours to 6 hours) and MODE 5 (from 37 hours to 36 hours) by 1 hour.	3.3.15 ACTION C	3.7.6.1
3.3.15 M02	The CTS does not require a CHANNEL CHECK, CHANNEL FUNCTIONAL TEST, or a CHANNEL CALIBRATION for the Station Vent Normal Range Radiation Monitoring instrumentation. ITS SR 3.3.15.1 requires performance of a CHANNEL CHECK every 12 hours. ITS SR 3.3.15.2 requires performance of a CHANNEL FUNCTIONAL TEST every 92 days. ITS SR 3.3.15.3 requires performance of a CHANNEL CALIBRATION every 18 months. This changes the CTS by adding new SRs.	SR 3.3.15.1 SR 3.3.15.2 SR 3.3.15.3	None

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.15 M03	The CTS does not have any requirements for the Control Room Emergency Ventilation System during movement of irradiated fuel assemblies. ITS 3.3.15 Applicability includes "During movement of irradiated fuel assemblies." ITS 3.3.15 ACTION A provides compensatory measures when one channel is inoperable and ITS 3.3.15 ACTION B provides compensatory measures when both channels are inoperable. ITS 3.3.15 ACTION D provides compensatory measures when ACTION A or B is not met during movement of irradiated fuel assemblies. This changes the CTS by adding additional Applicability criteria and associated ACTIONS.	3.3.15 Applicability 3.3.15 ACTIONS A, B, and D	None
3.3.16 M01	CTS Table 3.3-17 ACTION 20 states that with the number of OPERABLE channels for Functional Unit 3 (Output Logic) one less than the Total Number of Channels, operation can continue provided certain conditions are met. If the conditions are not met, CTS Table 3.3-17 ACTION 20 provides no follow-on actions; thus CTS 3.0.3 would be required to be entered. In this specific case, CTS 3.0.3 requires actions to be initiated within 1 hour to place the unit in MODE 2 (since the Functional Unit is only applicable in MODE 1) within 6 hours. Under the same conditions, ITS 3.3.16 Required Action B.2 requires the unit to be placed in MODE 2 within 6 hours. This changes the CTS by reducing the total time to reach MODE 2 from 7 hours (1 hour to initiate action and 6 hours to reach MODE 2) to 6 hours.	3.3.16 Required Action B.2	Table 3.3-17 Action 20, 3.0.3

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.17 M01	CTS 3.3.3.6 Action a requires, with the number of OPERABLE post accident monitoring channels less than the minimum channels OPERABLE requirements of Table 3.3-10, that the inoperable channel be restored to OPERABLE status within 30 days. ITS 3.3.17 ACTION C requires with one or more Functions with two required channels inoperable, restoration of one channel to OPERABLE status within 7 days. This changes the CTS requirement by reducing the allowed outage time when two required channels of PAM instrumentation Functions are inoperable from 30 days to 7 days.	3.3.17 ACTION C	3.3.3.6 Action a
3.3.17 M02	CTS 3.3.3.6 Action a requires, when required channels are not restored within the allowed outage time that the unit be in at least HOT SHUTDOWN within the next 12 hours. ITS 3.3.17 ACTION E requires the unit to be placed in MODE 3 (HOT STANDBY) within 6 hours (Required Action E.1) and MODE 4 (HOT SHUTDOWN) within 12 hours (Required Action E.2). This changes the CTS requirement by requiring the unit to be in MODE 3 within 6 hours.	3.3.17 ACTION E	3.3.3.6 Action a
3.3.17 M03	CTS 3.3.3.6 Action b states that the provisions of Specification 3.0.4 are not applicable. ITS 3.3.17 does not include this Note. This changes the CTS by deleting the specific exception to Specification 3.0.4.	None	3.3.3.6 Action b

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.17 M04	CTS Table 3.3-10 Instruments 16 (Containment Wide Range Water Level), 17 (Containment Wide Range Pressure), 19 (Reactor Coolant Hot Leg Level (Wide Range)), 20 (Neutron Flux (Wide Range) and 21 (Neutron Flux (Source Range)) in part only require one channel to be OPERABLE. ITS Table 3.3.17-1 Functions 1 (Wide Range Neutron Flux), 4 (Reactor Coolant (RC)Hot Leg Level (Wide Range), 5 (Containment Water Level (Wide Range)), 6 (Containment Pressure (Wide Range)), and 17 (Neutron Flux Source Range)) require two channels to be OPERABLE. This changes the CTS by changing the number of OPERABLE channels per Function from one to two.	Table 3.3.17-1 Functions 1, 4, 5, 6, and 17	Table 3.3-10 Instruments 16, 17, 19, 20, and 21
3.3.17 M05	CTS Table 3.3-10 does not require OPERABLE indication channels for Penetration Flow Path Containment Isolation Valve (CIV) Position. ITS Table 3.3.17-1, Function 7 requires two channels per penetration flow path to be OPERABLE for each Penetration Flow Path CIV Position. This requirement is modified by two footnotes, footnotes (a) and (b). Footnote (a) does not require position indication for isolation valves whose penetration is isolated by at least one closed and deactivated automatic valve, blind flange, or check valve with flow through the valve secured. Footnote (b) requires only one position indication channel per penetration flow path with only one installed control room indication channel. ITS 3.3.17 ACTION A has been added to cover the Condition when one or more of the above Functions have one required channel inoperable. ITS 3.3.17 Required Action A.1 allows 30 days to restore the required channel to OPERABLE status. If the Required Action and associated CT of Condition A is not met, then ITS 3.3.17 Required Action B.1 requires the immediate initiation of the action specified in Specification 5.6.5. ITS 3.3.17 ACTION C has been added to cover the Condition when one or more Function have two required channels inoperable. ITS 3.3.17 Required Action C.1 requires restoration of one channel to OPERABLE status within 7 days. If the Required Action	Table 3.3.17-1 Function 7, including footnotes a and b, 3.3.17 ACTIONS A, B, C, D, and E, SRs 3.3.17.1 and 3.3.17.3	None

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	and associated CT of Condition C cannot be met, then ITS 3.3.17 Condition D must entered, which will then require entry into Condition E. ITS 3.3.17 Required Action E.1 will require the unit to be in MODE 3 within 6 hours and ITS 3.3.17 Required Action E.2 will require the unit to be MODE 4 within 12 hours. A Note has been added to the ACTIONS to allow Separate Condition entry for each Function. In addition, separate Condition entry is allowed within a Function for Function 7 on a penetration flow path basis, since the titles of the Function includes the term "per Penetration Flow Path." In addition, SRs are added for this Function. These SRs are a CHANNEL CHECK for each required instrumentation channel that is normally energized (SR 3.3.17.1) and a CHANNEL CALIBRATION (SR 3.3.17.3). This changes the CTS by adding new Functions, Footnotes, a Note, applicable ACTIONS, and SRs.		

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.17 M06	CTS Table 3.3-10 Instrument 6 (Containment Vessel Post-Accident Radiation) requires two channels to be OPERABLE. CTS Table 4.3-10, which provides the SRs for the PAM instruments, lists two types of instruments – the Containment High Range Radiation and Containment Wide range Noble Gas. Since there are two channels of each type of instrument, any two of the four total channels can be used to meet the CTS Table 3.3-10 requirements. CTS 3.3.3.6 Action a provides 30 days to restore inoperable channels when both required Containment Vessel Post-Accident Radiation channels are inoperable (i.e., all four of the total channel are inoperable). Otherwise, a unit shutdown is required. ITS Table 3.3.17-1 continues to require two OPERABLE channels; however, only the Containment High Range Radiation channels can be used to meet the LCO requirement. The Containment Wide Range Noble Gas channels are not allowed to be credited with meeting the two channel requirement. When both of the required channels are inoperable (i.e., both Containment High Range Radiation channels), ITS 3.3.17 ACTION F, through the ITS 5.6.5 requirement, will allow the Containment Wide Range Noble Gas channels to be the preplanned alternate means of monitoring. However, ITS 5.6.5 will also require a report be made to the NRC concerning the inoperabilities. Furthermore, since the Containment Wide Range Radiation channels are now not allowed to be used, the specific SRs in CTS Table 4.3-10 are not included in the ITS. This changes the CTS by deleting the allowance that the Containment Wide Range Noble Gas channels can satisfy the requirements of the LCO. It also deletes the SRs associated with the Containment Wide Range Noble Gas channels and modifies the ACTIONS to require a report be submitted to the NRC when the Containment Wide Range Noble Gas channels are being used as the preplanned alternate means of monitoring when the Containment High Range Radiation channels are inoperable.	3.3.17 ACTION F, Table 3.3.17-1 Function 8	Table 4.3-10 Instrument 6.b)

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.18 M01	CTS 3.3.3.5.1 Action a requires, if an inoperable channel cannot be returned to OPERABLE status within the allowed outage time, then the unit shall be placed in HOT SHUTDOWN within the next 12 hours. ITS 3.3.18 ACTION B requires, if a required channel cannot be returned to OPERABLE status within the associated CT, then the unit shall be in MODE 3 (HOT STANDBY) within 6 hours and MODE 4 (HOT SHUTDOWN) within 12 hours. This changes the CTS requirements by specifying that MODE 3 must be achieved within 6 hours.	3.3.18 ACTION B	3.3.3.5.1 Action a

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.18 M02	CTS 3.3.3.5.1 Action c states that "the provisions of Specification 3.0.4 are not applicable." CTS 3.0.4 states, "Entry into an OPERATIONAL MODE or other specified applicability conditions shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements unless otherwise excepted." ITS 3.3.18 contains no provision excepting the requirements of ITS LCO 3.0.4. However, ITS LCO 3.0.4 states "When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made: a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time; b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications; or c. When an allowance is stated in the individual value, parameter, or other Specification. This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit" (See 3.0 DOC L01 for discussion of this change). Therefore, ITS LCO 3.0.4.a and LCO 3.0.4.b would be applicable to ITS 3.3.18. This changes the CTS by removing the allowance to enter the specified applicability with an inoperable remote shutdown monitoring instrumentation Function while relying on the provisions contained in the ACTION statements, and only allowing entry into the specified applicability with an inoperable remote shutdown monitoring instrumentation Function after performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate.	None	3.3.3.5.1 Action c

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.1 M01	CTS 3.2.5 requires that departure from nucleate boiling (DNB) parameters specified in CTS Table 3.2-2, including RC pressure, be maintained within specified limits. CTS Table 3.2-2 requires the measured RCS pressure to be ≥ 2062.7 psig for four RCP operation and ≥ 2058.7 psig for three RCP operation. ITS LCO 3.4.1.a requires RCS loop pressure be ≥ 2064.8 psig for four RCP operation and ITS LCO 3.4.1.b requires RCS loop pressure be ≥ 2060.8 psig for three RCP operation. These values are also provided in ITS SR 3.4.1.1. This changes the CTS by increasing the DNB RC pressure parameter limits.	LCO 3.4.1 a and b SR 3.4.1.1	Table 3.2-2
3.4.3 M01	CTS 3.4.9.1 Action states that if the P/T limits are exceeded, an analysis must be performed and a determination made that the RCS remains acceptable for continued operation. No time limit is given for the performance of this analysis and determination. ITS 3.4.3 Required Action A.2 states that when the LCO is not met in MODES 1, 2, 3, or 4, determination is required that the RCS is acceptable for continued operation within 72 hours. ITS 3.4.3 Required Action C.2 states that when the LCO is not met any time other than in MODES 1, 2, 3, or 4, determination is required that the RCS is acceptable for continued operation prior to entering MODE 4. This changes the CTS by specifying a finite time to perform the determination.	3.4.3 Required Actions A.2 and C.2	3.4.9.1 Action
3.4.4 M01	CTS 3.4.1.1 does not specify a default Action if more than one RCP is not in operation or if the trips are not reduced in the 4 hour time period required by the CTS 3.4.1.1 Action. Thus, CTS 3.0.3 would be entered requiring entry into HOT STANDBY (MODE 3) within 7 hours. ITS 3.4.4 ACTION B requires the plant to be in MODE 3 within 6 hours under the same conditions. This changes the CTS by providing one less hour for entry into MODE 3.	3.4.4 ACTION B	3.4.1.1 Action

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.5 M01	ITS SR 3.4.5.3 requires verification that correct breaker alignment and indicated power are available to each required pump. A Note further explains that the Surveillance is not required to be performed until 24 hours after a required pump is not in operation. This Surveillance is not required by the CTS. This changes the CTS by requiring verification of correct breaker alignment and indicated power availability on required RCPs that are not in operation.	SR 3.4.5.3	None
3.4.6 M01	When one RCS loop is inoperable, CTS 3.4.1.2 Action a requires a unit cooldown to COLD SHUTDOWN (MODE 5) only if immediate action is not initiated to restore the inoperable RCS loop as soon as possible. As long as action is being taken to restore the loop, entry into MODE 5 is not required. Under the same conditions, ITS 3.4.6 ACTION A will require both of the CTS Actions to be taken - immediately initiating action to restore the inoperable RCS loop and a cooldown to MODE 5. This changes the CTS by requiring a unit cooldown to MODE 5 anytime one RCS loop is inoperable.	3.4.6 ACTION A	3.4.1.2 Action a
3.4.6 M02	ITS SR 3.4.6.3 requires verification that correct breaker alignment and indicated power are available to each required pump. A Note further explains that the Surveillance is not required to be performed until 24 hours after a required pump is not in operation. This Surveillance is not required by the CTS. This changes the CTS by requiring verification of correct breaker alignment and indicated power availability on required pumps that are not in operation.	SR 3.4.6.3	None
3.4.7 M01	Not used.	NA	NA

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.7 M02	ITS SR 3.4.7.3 requires verification that correct breaker alignment and indicated power are available to each required pump. A Note further explains that the Surveillance is not required to be performed until 24 hours after a required pump is not in operation. This Surveillance is not required by the CTS. This changes the CTS by requiring verification of correct breaker alignment and indicated power availability on required DHR pumps that are not in operation.	SR 3.4.7.3	None
3.4.8 M01	CTS 3.4.1.2 footnote ** contains an allowance for the decay heat removal pumps to be de-energized for up to one hour. ITS LCO 3.4.8 Note 1 allows all DHR pumps to be removed from operation for ≤ 15 minutes only when switching from one loop to the other, and also requires that no draining operations to further reduce the RCS water volume are permitted (part c). This changes the CTS by reducing the time allowed for the DHR pump to be de-energized from 1 hour to 15 minutes, restricts the allowance to only pump switching operations, and adds a restriction that no draining operations are permitted to further reduce the RCS water volume.	3.4.8 Note 1	3.4.1.2 footnote **
3.4.8 M02	CTS 3.4.1.2 footnote ** part (2) allows the DHR pumps to be de-energized provided the core outlet temperature is maintained at least 10°F below saturation temperature. ITS LCO 3.4.8 Note 1 provides a similar allowance, but requires the maximum RCS temperature to be ≤ 190°F. This changes the CTS by requiring the RCS temperature to be ≤ 190°F instead of 10°F below saturation temperature.	LCO 3.4.8 Note 1	3.4.1.2 footnote **

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.8 M03	ITS SR 3.4.8.2 requires verification that correct breaker alignment and indicated power are available to each required pump. A Note further explains that the Surveillance is not required to be performed until 24 hours after a required pump is not in operation. This Surveillance is not required by the CTS. This changes the CTS by requiring verification of correct breaker alignment and indicated power availability on required DHR pumps that are not in operation.	SR 3.4.8.2	None
3.4.9 M01	CTS 3.4.4 does not contain requirements for the pressurizer heaters. ITS LCO 3.4.9.b has been added requiring the pressurizer to be OPERABLE with a minimum of 85 kW of essential pressurizer heaters OPERABLE. ITS 3.4.9 ACTIONS C and D have been added to provide compensatory measures when the new requirement is not met. ITS 3.4.9 ACTION C, which applies when the capacity of pressurizer heaters is less than 85 kW, requires restoration of the essential pressurizer heater capability within 72 hours. If the heater capability is not restored within 72 hours, ITS 3.4.9 ACTION D requires the unit to be in MODE 4 within 12 hours. In addition, SR 3.4.9.2 has been added, and requires verification that the essential pressurizer heater capacity is greater than or equal to 85 kW every 24 months.	LCO 3.4.9.b 3.4.9 ACTIONS C and D SR 3.4.9.2	None

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.9 M02	CTS 3.4.4 only requires the pressurizer to be OPERABLE in MODES 1 and 2. If the pressurizer is inoperable, the CTS Actions allows 1 hour to restore the pressurizer to OPERABLE status or the unit must be in HOT STANDBY (MODE 3) with the CRD trip breakers open within the next 6 hours. ITS 3.4.9 requires the pressurizer to be OPERABLE in MODES 1, 2, and 3. If the pressurizer is not restored to OPERABLE status under the same conditions as the CTS (water level not within limit) within 1 hour, the unit must be in MODE 3 in 6 hours and in MODE 4 in 12 hours. This changes the CTS by expanding the Applicability of the Pressurizer to include MODE 3 and requiring the unit to exit this new Applicability within 12 hours. The deletion of the Action to open the CRD trip breakers is discussed in DOC A03.	3.4.9 Applicability 3.4.9 ACTION B	3.4.4 Applicability 3.4.4 Action
3.4.10 M01	CTS 3.4.3 Action requires, in part, that with one pressurizer code safety valve inoperable, to either restore it within 15 minutes or be in HOT SHUTDOWN (MODE 4) within 12 hours. ITS 3.4.10 ACTION A requires that with one pressurizer safety valve inoperable, to restore the valve to OPERABLE status within 15 minutes. If not restored, ITS 3.4.10 ACTION B requires the unit to be in MODE 3 within 6 hours and MODE 4 within 12 hours. This changes the CTS by requiring entry into MODE 3 within 6 hours when a shutdown is required.	3.4.10 ACTION B	3.4.3 Action
3.4.10 M02	CTS 3.4.3 Action does not provide any actions for when two pressurizer safety valves are inoperable. Therefore, CTS 3.0.3 would be entered requiring entry into HOT STANDBY (MODE 3) within 7 hours and HOT SHUTDOWN (MODE 4) within 13 hours. ITS 3.4.10 ACTION B, which applies when two pressurizer safety valves are inoperable, requires a shutdown to MODE 3 within 6 hours and to MODE 4 within 12 hours. This changes the CTS by providing one less hour to shut down the unit to both MODE 3 and MODE 4 following discovery of two inoperable pressurizer safety valves.	3.4.10 ACTION B	3.4.3 Action 3.0.3

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.10 M03	CTS 4.4.3 requires a verification that the pressurizer safety valve lift setting is within the limit of CTS 3.4.3 (i.e., < 2525 psig). ITS SR 3.4.10.1 includes a similar requirement, but also requires that following testing, the lift setting must be within +/- 1 percent of the nominal setting (2500 psig). This changes the CTS by requiring a minimum pressurizer safety valve setpoint after testing of ≥ 2475 psig.	SR 3.4.10.1	4.4.3
3.4.11 M01	CTS 3.4.3 does not provide any actions for when the pressurizer pilot operated relief valve (PORV) or block valve are inoperable and not isolated. Therefore, CTS 3.0.3 would be entered, requiring entry into HOT STANDBY (MODE 3) within 7 hours and HOT SHUTDOWN (MODE 4) within 13 hours. With the PORV inoperable, ITS 3.4.11 ACTION A requires the block valve to be closed within 1 hour and power removed from the block valve within 1 hour. With the block valve inoperable, ITS 3.4.11 ACTION B requires the block valve to be closed within 1 hour and power removed from the block valve within 1 hour. If either of these actions are not met, ITS 3.4.11 ACTION C requires a shutdown to MODE 3 within 6 hours and to MODE 4 within 12 hours. This changes the CTS by stating the ACTIONS rather than deferring to CTS 3.0.3 and by adding the requirement to remove power from the block valve.	3.4.11 ACTIONS A, B, and C	3.4.3 Action 3.0.3
3.4.11 M02	CTS 4.4.3 does not specify SRs to cycle the pressurizer PORV and the block valve. ITS SR 3.4.11.1 requires performance of one complete cycle of the block valve every 92 days. This SR is modified by a Note stating that the Surveillance is not required to be performed with the block valve closed in accordance with the Required Action of the LCO. ITS SR 3.4.11.2 requires cycling of the PORV every 24 months. This changes the CTS by adding specific requirements to cycle the block valve and the PORV.	SR 3.4.11.1 SR 3.4.11.2	None

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.12 M01	CTS 3.4.2 is applicable in MODES 4 and 5. CTS Figure 3.4-2b is applicable in MODE 5. ITS LCO 3.4.12 is applicable in MODES 4 and 5, and MODE 6 when the reactor vessel head is on. In addition, Figure 3.4.12-2 is applicable in MODE 5 and MODE 6 when the reactor vessel head is on. This change expands the Applicability of the low temperature overpressure protection components to be OPERABLE in MODE 6 when the reactor vessel head is on.	3.4.12 Applicability	3.4.2 Figure 3.4-2b
3.4.12 M02	CTS 3.4.2 Actions B and C provide compensatory measures if DH-11 or DH-12 is not open and control power removed. DH-11 and DH-12 provide a relief path for the DHR System relief valve. However, the CTS provides no default action for non compliance with either CTS 3.4.2 Action B or C. Furthermore, since the unit is already in a shutdown condition, CTS LCO 3.0.3 would not require anything other than putting the unit in MODE 5 (if the unit were in MODE 4), and this would not compensate for the inoperable flow path. ITS 3.4.12 ACTIONS A and B provide similar compensatory measures as CTS 3.4.2 Actions B and C when DH-11 or DH-12 is not open and control power removed. In addition, if ITS 3.4.12 ACTION A or B is not met, ITS 3.4.12 ACTION D will require similar compensatory actions as is required by CTS 3.4.2 Action A.2. This changes the CTS by providing clear, specific Actions if CTS 3.4.2 Action B or C is not met.	3.4.12 ACTION D	3.4.2 Actions A.2, B, and C

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.14 M01	CTS 3.4.6.2 Actions b and c specify the compensatory actions to take when the leakage through any RCS pressure isolation valve(s)(PIV(s)) is greater than the specified limit. The compensatory action is to isolate the high pressure portion of the affected system from the low pressure portion of the affected system by use of a combination of at least two closed valves. The CTS does not include any leakage restrictions that may be used to satisfy the isolation requirement of this action. ITS 3.4.14 ACTION A is consistent with the requirement in CTS 3.4.6.2 Action c, however, a Note has been added to the Required Actions (ITS 3.4.14 Required Actions A.1 and A.2 Note) which specifies that each valve used to satisfy ITS 3.4.14 Required Actions A.1 and A.2 must have been verified to meet SR 3.4.14.2.a, the RCS PIV maximum leakage limit SR, and either be in the RCS pressure boundary or the high pressure portion of the system. This changes the CTS by providing a Note which explicitly states that the valves used to satisfy Required Action must satisfy the same leakage requirements of the RCS PIVs and provides an option for them to be in the RCS pressure boundary.	3.4.14 Required Actions A.1 and A.2 Note	3.4.6.2 Action c
3.4.14 M02	The CTS does not require a CHANNEL CALIBRATION of the decay heat isolation valve interlock channel that is not common to SFAS instrumentation. ITS SR 3.4.14.5 requires a CHANNEL CALIBRATION every 24 months. This changes the CTS by adding a specific CHANNEL CALIBRATION requirement for this channel.	SR 3.4.14.5	None

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5.1 M01	CTS LCO 3.5.1.b requires each core flooding tank (CFT) contained water volume to be between 7555 gallons and 8004 gallons of borated water. CTS LCO 3.5.1.d requires each CFT nitrogen cover pressure to be between 575 psig and 625 psig. In the ITS, the CFT borated water volume is specified in ITS SR 3.5.1.2 and the CFT nitrogen cover pressure is specified in the ITS SR 3.5.1.3. ITS SR 3.5.1.2 requires the borated water volume in CFT to be ≥ 12.6 feet and ≤ 13.3 feet and ITS SR 3.5.1.3 requires the nitrogen cover pressure in each CFT to be ≥ 580 psig and ≤ 620 psig. This changes the CTS by specifying a narrower range for the CFT borated water volume and nitrogen cover pressure.	SR 3.5.1.2 SR 3.5.1.3	3.5.1.b 3.5.1.d
3.5.2 M01	CTS 3.5.2 Actions a and b requires that when one inoperable emergency core cooling system (ECCS) subsystem is not restored to OPERABLE status within the allowed CTs, the unit must be in HOT SHUTDOWN within the next 12 hours. In addition to maintaining the requirement for the unit to be in MODE 4 within 12 hours (ITS 3.5.2 Required Action C.2) if the inoperable ECCS train is not restored to OPERABLE status within the allowed CT, ITS 3.5.2 Required Action C.1 also requires the unit to be in MODE 3 within 6 hours. This changes the CTS by requiring entry into MODE 3 within 6 hours when a shutdown is required.	3.5.2 ACTION C	3.5.2 Actions a and b

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5.3 M01	CTS 3.5.3 Action a requires that when the ECCS subsystem is inoperable, the ECCS subsystem must be restored to OPERABLE status within 1 hour or the RCS Tavg must be maintained < 280°F by use of alternate heat removal methods. ITS 3.5.3 ACTION A requires the immediate initiation of action to restore the required ECCS low-presssure injection (LPI) subsystem to OPERABLE status. This changes the CTS by specifically stating that action to restore the ECCS LPI subsystem to OPERABLE status must be initiated immediately, and does not allow alternate decay heat methods to be used in lieu of restoring the subsystem.	3.5.3 ACTION A	3.5.3 Action a
3.5.4 M01	CTS LCO 3.5.4.c provides a minimum BWST water temperature limit but does not provide a maximum water temperature limit and CTS 4.5.4.b verifies the minimum limit every 24 hours when air temperature is < 35°F. ITS SR 3.5.4.1 includes both a minimum and a maximum BWST water temperature limit. In addition, the ITS SR 3.5.4.1 Note only requires the BWST water temperature to be verified within the limits if the ambient air temperature is greater than new maximum BWST water temperature limit or less than the current minimum BWST water temperature limit. This changes the CTS by adding a new maximum BWST water temperature limit and requires it checked every 24 hours unless the ambient air temperature is less than or equal to the maximum BWST water temperature limit.	SR 3.5.4.1	3.5.4.c 4.5.4.b
3.6.1 M01	CTS 3.6.3.1 Action b and c allow 4 hours to isolate the affected penetration when one or more CIVs are inoperable. ITS 3.6.3 Required Action B.1 will only allow 1 hour to isolate the affected penetration flow path when both valves in the same penetration flow path are inoperable. This changes the CTS by decreasing the time allowed to isolate the affected penetration when both CIVs in the same penetration are inoperable.	3.6.3 Required Action B.1	3.6.3.1 Actions b and c

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.3 M01	CTS 3.6.3.1 Action b and c allow 4 hours to isolate the affected penetration when one or more CIVs are inoperable. ITS 3.6.3 Required Action B.1 will only allow 1 hour to isolate the affected penetration flow path when both valves in the same penetration flow path are inoperable. This changes the CTS by decreasing the time allowed to isolate the affected penetration when both CIVs in the same penetration are inoperable.	3.6.3 Required Action B.1	3.6.3.1 Actions b and c
3.6.6 M01	ITS SR 3.6.6.5 requires verifying each required containment air cooling train cooling water flow rate is ≥ 1150 gpm every 24 months. ITS SR 3.6.6.3 requires verifying each containment spray pump's developed head at the flow test point is greater than or equal to the required developed head in accordance with the Inservice Testing Program. The CTS does not include these SRs. This changes the CTS by adding two new SRs.	SR 3.6.6.3 SR 3.6.6.5	None
3.6.6 M02	CTS 3.6.2.2 requires two containment cooling units be OPERABLE in MODES 1, 2 and 3. The CTS 3.6.2.2 Action also requires the unit to be shut down to HOT SHUTDOWN (MODE 4) within 12 hours if an inoperable containment cooling train is not restored to OPERABLE status within the allowed restoration time. ITS 3.6.6 requires two containment air cooling trains be OPERABLE in MODES 1, 2, 3, and 4. ITS 3.6.6 ACTION F requires the unit to be shut down to MODE 3 within 6 hours and MODE 5 within 36 hours if the inoperable containment air cooling trains are not restored within the allowed restoration time. This changes the CTS by requiring the containment cooling trains to be OPERABLE in MODE 4 and providing actions to exit this new Applicability.	3.6.6 Applicability 3.6.6 ACTION F	3.6.2.2 Applicability 3.6.2.2 Action

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.1 M01	CTS 3.7.1 Action a.2.a states that the High Flux Trip Setpoint must be reduced per Equation 3.7-1 when one or more MSSVs are found to be inoperable. CTS Equation 3.7-1 provides the maximum allowable High Flux Trip Setpoint corresponding to the maximum number of inoperable MSSVs on any operating SG. ITS 3.7.1 ACTION A requires both a reduction in THERMAL POWER and a reduction in the High Flux Trip Setpoint consistent with the requirements of ITS Equation 3.7.1-1. The reduction in THERMAL POWER is based on RTP, not the High Flux Setpoint. This changes the CTS by adding an additional explicit statement to reduce THERMAL POWER consistent with ITS Equation 3.7.1-1.	3.7.1 ACTION A	3.7.1 Action a.2.a
3.7.2 M01	CTS 3.7.1.5 Action MODE 1 requires restoring the inoperable main steam isolation valve (MSIV) to OPERABLE status or closing the MSIV. CTS 3.7.1.5 Action MODES 2 and 3 states, in part, that subsequent operation in MODE 1, 2, or 3 is allowed if the MSIV is maintained closed. ITS 3.7.2 ACTION A does not include the specific option to close the inoperable MSIV when in MODE 1, only the requirement to restore the MSIV is provided. This changes the CTS by eliminating the allowance to close the inoperable MSIV and continue to operate when in MODE 1.	3.7.2 ACTION A	3.7.1.5 Action MODE 1
3.7.2 M02	CTS 3.7.1.5 Action MODE 1 states, in part, that if one inoperable MSIV cannot be restored to OPERABLE status or closed within the allowed time, to be in HOT SHUTDOWN (MODE 4) within the next 12 hours. Under similar conditions, ITS 3.7.2 ACTION B requires the unit to be shutdown to MODE 2 within 6 hours. This changes the CTS by reducing the time to be outside the applicability of the Action statement.	3.7.2 ACTION B	3.7.1.5 Action MODE 1

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.2 M03	CTS 3.7.1.5 Action MODES 2 and 3, in part, requires that when one MSIV is inoperable in MODE 2 or 3, the MSIV is to be maintained closed. Once closed, no actions are required to periodically verify the MSIV remains closed. When one MSIV is inoperable in MODE 2 or 3, ITS 3.7.2 Required Action C.1 requires the inoperable MSIV to be closed within 8 hours. In addition, ITS 3.7.2 Required Action C.2 requires a verification that the MSIV is closed once per 7 days. This changes the CTS by adding a periodic verification that the inoperable MSIV remains closed. The change in the time to close the MSIV is discussed in DOC L02.	3.7.2 Required Action C.2	3.7.1.5 Action MODES 2 and 3
3.7.2 M04	CTS 3.7.1.5 Action MODES 2 and 3 states that if one MSIV can not be restored to OPERABLE status or closed within the allowed time, to be in HOT SHUTDOWN (MODE 4) within the next 12 hours. Under similar conditions, ITS 3.7.2 ACTION D states to be in MODE 3 in 6 hours and MODE 4 in 12 hours. This changes the CTS by specifying that MODE 3 must be achieved within 6 hours.	3.7.2 ACTION D	3.7.1.5 Action MODES 2 and 3
3.7.2 M05	CTS 3.7.1.5 does not include a requirement to verify that each MSIV actuates to the isolation position on an actual or simulated actuation signal. ITS 3.7.2.2 is being added to perform this requirement every 24 months. This changes the CTS by adding a new SR.	SR 3.7.2.2	None

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.3 M01	The CTS 3.7.1.8 Action states, in part, that with one or more main feedwater control valves (MFCVs) or startup feedwater control valves (SFCVs) inoperable, to isolate the affected flowpath within 72 hours. ITS 3.7.3 ACTION D will require isolation of the affected flowpath within 8 hours if a main feedwater safety valve (MFSV) is inoperable in the same flowpath as the inoperable MFCV or SFCV. This changes the CTS by reducing the time to isolate the affected penetration if a MFSV is inoperable concurrent with an inoperable MFCV or SFCV in the same flowpath.	3.7.3 ACTION D	3.7.1.8 Action
3.7.3 M02	CTS 3.7.1.8 does not include a requirement to verify that each MFCV and SFCV actuate to the isolation position on an actual or simulated actuation signal. CTS 3.6.3.1 does not include a requirement to verify that each actuate to the isolation position on an actual or simulated actuation signal. (While CTS 4.6.3.1.2 requires an actuation test, the test signal specified, a containment isolation test signal, does not actuate the MFSVs; thus the MFSVs are not covered by an actuation test). ITS SR 3.7.3.3 is being added to perform this requirement every 24 months. This changes the CTS by adding additional SRs.	SR 3.7.3.3	None
3.7.4 M01	CTS 3.7.1.9 does not include a requirement to verify that each turbine stop valve actuates to the isolation position on an actual or simulated actuation signal. ITS SR 3.7.4.2 is being added to perform this requirement every 24 months. This changes the CTS by adding an additional SR.	SR 3.7.4.2	None

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.5 M01	CTS 3.7.1.2 Action a states that if the inoperable AFW train cannot be restored to OPERABLE status within the allowed time, to be in HOT SHUTDOWN (MODE 4) within the next 12 hours. The CTS 3.7.1.7 Action states that if the inoperable motor driven feedwater pump (MDFP) train cannot be restored to OPERABLE status within the allowed time, to be in HOT SHUTDOWN (MODE 4) within the next 12 hours. Under similar conditions, ITS 3.7.2 ACTION D states to be in MODE 3 in 6 hours and MODE 4 in 12 hours. This changes the CTS by specifying that MODE 3 must be achieved within 6 hours.	3.7.2 ACTION D	3.7.1.2 Action a

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.5 M02	CTS 3.7.1.2 does not provide any actions when both AFW trains are inoperable for reasons other than those provided in CTS 3.7.1.2 Action c (which actually describes a condition in which both AFW trains and the MDFP train is inoperable, as described in DOC L02). Thus, if only two AFW trains are inoperable, CTS 3.0.3 must be entered. CTS 3.0.3 requires a unit shutdown to commence within 1 hour, and the unit to be placed in MODE 3 in the next 6 hours and in MODE 4 in the following 6 hours. CTS 3.7.1.7 provides the requirements for the MDFP train. Since this is a separate Technical Specification that is not part of CTS 3.7.1.2, the AFW train Technical Specification, no actions are provided in either CTS 3.7.1.2 or 3.7.1.7 to cover the condition of one AFW train inoperable concurrent with the MDFP train being inoperable. Thus, if an AFW train and MDFP train are concurrently inoperable, CTS 3.7.1.2 Action a would allow 72 hours to restore the inoperable AFW train to OPERABLE status and the CTS 3.7.1.7 Action would allow 72 hours to restore the inoperable MDFP train to Operable status, prior to requiring a unit shutdown. However, CTS 4.7.1.2.1.a (the AFW pump flow rate test) and 4.7.1.2.1.f (a post-maintenance flow test) includes a footnote (footnote *) that states if an AFW train is inoperable due to realigning valves for Surveillance testing concurrent with the MDFP train being inoperable, then a dedicated individual (in communication with the control room) shall be stationed at the realigned AFW train valves so that they can be restored to OPERABLE status if required. A similar footnote (footnote **) requiring stationing an individual at the MDFP train valves if one AFW train is inoperable is provided for CTS 4.7.1.7.c.2 and 4.7.1.7.c.3 (the MDFP train flow test). As long as these footnote allowances are followed, the 72 hour restoration times provided in CTS 3.7.1.2 Action a and CTS 3.7.1.7 Action are allowed. ITS 3.7.5 ACTION C will limit the restoration time to 48 hours if the MDFP train is inoperable concurrent with an AFW train inoperable due to one inoperable steam supply. ITS 3.7.5 Condition D, second	3.7.5 ACTIONS C and D	3.7.1.2 Actions 3.7.1.7 Actions 3.0.3

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	Condition, covers the case where any two EFW trains (i.e., two AFW trains or one AFW train and the MDFP train) are inoperable for reasons other than Condition C (the MDFP train inoperable concurrent with an AFW train inoperable due to one inoperable steam supply). When in this Condition, a unit shutdown to MODE 3 within 6 hours and to MODE 4 within 12 hours is required. This changes the CTS by a) reducing the time the MDFP train can be inoperable concurrent with an AFW train inoperable due to one inoperable steam supply from 72 hours to 48 hours; b) reducing the time the MDFP train can be inoperable concurrent with an AFW train being inoperable for reasons other than an inoperable steam supply from 72 hours to no time (i.e., no restoration time is provided); and c) reducing the time to be in MODE 3 from 7 hours to 6 hours and MODE 4 from 13 hours to 12 hours when both AFW trains are inoperable.		

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.5 M03	CTS 4.7.1.2.1.a.1 requires a flow rate test of the AFW trains. It is modified by an allowance that the provisions of Specification 4.0.4 are not applicable for entry into MODE 3. CTS 4.7.1.2.1.c.2 requires a verification that each AFW pump starts upon receipt of a SFRCS actuation test signal. It is also modified by an allowance that the provisions of Specification 4.0.4 are not applicable for entry into MODE 3. Since the Applicability of CTS 3.7.1.2 is MODES 1, 2, and 3, these statements essentially allow the unit to enter MODE 3 without having the two Surveillances performed (current) within the associated Frequency. The two Surveillances must be performed (i.e., current) prior to entering MODE 2. ITS SR 3.7.5.2 and SR 3.7.5.5 require similar Surveillances. However, they are modified by a Note that states the SRs are not required to be performed until 24 hours after reaching 800 psig in the SGs. This changes the CTS by limiting the amount of time the unit can operate in MODE 3 prior to requiring the Surveillances to be performed.	SR 3.7.5.2 SR 3.7.5.5	4.7.1.2.1.a.1 4.7.1.2.1.c.2
3.7.5 M04	The CTS 3.7.1.7 requirements for the MDFP train are applicable in MODES 1, 2, and 3. ITS 3.7.5 requirements for the MDFP train are applicable in MODES 1, 2, and 3, and in addition, MODE 4 when a SG is relied upon for heat removal. Consistent with this change in Applicability, a new ACTION (ITS 3.7.5 ACTION F) has been provided when the MDFP train is inoperable in MODE 4, and the new ACTION requires action to be immediately initiated to restore the MDFP train to OPERABLE status. This changes the CTS 3.7.1.7 requirements by requiring the MDFP train to be OPERABLE in MODE 4 when a SG is relied upon for heat removal.	LCO 3.7.5 Note 3.7.5 Applicability 3.7.5 ACTION F	3.7.1.7 Applicability

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.6 M01	The CTS requirements on the CSTs are applicable in MODES 1, 2, and 3. ITS 3.7.6 is applicable in MODES 1, 2, and 3, and in addition, MODE 4 when a SG is relied upon for heat removal. Consistent with this change in Applicability, the requirement to be in MODE 4 "without reliance on steam generator for heat removal" is added as indicated in ITS 3.7.6 Required Action B.2. This changes the CTS requirements by requiring the CSTs to be OPERABLE in MODE 4 when a SG is relied upon for heat removal.	3.7.6 Applicability 3.7.6 Required Action B.2	3.7.1.3 Applicability
3.7.7 M01	The Action for CTS 3.7.3.1 allows 72 hours to restore an inoperable CCW loop to OPERABLE status. ITS 3.7.7 ACTION A has this same requirement, however two Notes have been included. The ITS 3.7.7 Required Action A.1 Note 1 requires entry into the applicable Conditions and Required Actions of LCO 3.8.1, "AC Sources-Operating," for an emergency diesel generator made inoperable by CCW. The ITS 3.7.7 Required Action A.1 Note 2 requires entry into the applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops - MODE 4," for decay heat removal loop made inoperable by CCW. This changes the CTS by explicitly specifying the applicable Conditions and Required Actions of ITS LCO 3.4.6 must be entered.	3.7.7 Required Action A.1 Notes 1 and 2	3.7.3.1 Action

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.8 M01	The Action for CTS 3.7.4.1 allows 72 hours to restore an inoperable service water system (SWS) loop to OPERABLE status. ITS 3.7.8 ACTION A has this same requirement, however two Notes have been included. The ITS 3.7.8 Required Action A.1 Note 1 requires entry into the applicable Conditions and Required Actions of LCO 3.8.1, "AC Sources- Operating," for emergency diesel generator made inoperable by SWS. The ITS 3.7.8 Required Action A.1 Note 2 requires entry into the applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops - MODE 4," for decay heat removal loop made inoperable by SWS. This changes the CTS by explicitly specifying the applicable Conditions and Required Actions of ITS LCO 3.4.6 must be entered.	3.7.8 Required Action A.1 Notes 1 and 2	3.7.4.1 Action
3.7.10 M01	The CTS does not have any requirements for the Control Room Emergency Ventilation System during movement of irradiated fuel assemblies. ITS 3.7.10 Applicability includes "During movement of irradiated fuel assemblies." ITS 3.7.10 LCO Note 2 clarifies that only the CRE boundary is required to be OPERABLE during this new Applicability. ITS 3.7.10 ACTION D provides compensatory measures when the CRE boundary is inoperable during movement of irradiated fuel assemblies. This changes the CTS by adding additional Applicability criteria and an associated ACTION.	LCO 3.7.10 Note 2, 3.7.10 Applicability, 3.7.10 ACTION D	None
3.7.15 M01	The CTS does not have any requirements for the spent fuel pool boron concentration when fuel assemblies are stored in the spent fuel storage pool. ITS 3.7.15 requires the spent fuel pool boron concentration to be ≥ 630 ppm when fuel assemblies are stored in the spent fuel pool and a spent fuel pool verification has not been performed since the last movement of fuel assemblies in the spent fuel pool. An appropriate ACTION and SR have also been added. This changes the CTS by incorporating the requirements of ITS 3.7.15.	3.7.15	None

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.17 M01	CTS Table 4.7-2 Item 2.a requires the DOSE EQUIVALENT I-131 sampling frequency to be once per 31 days whenever the gross activity determination indicates iodine concentrations greater than 10 percent of the allowable limit. CTS Table 4.7-2 Item 2.b allows the sampling frequency for the DOSE EQUIVALENT I-131 to be extended to once per 6 months whenever the gross activity determination indicates iodine concentrations below 10 percent of the allowable limits. ITS SR 3.7.17.1 does not provide this extended 6 month time frame for determining the DOSE EQUIVALENT I-131 and requires verification of specific activity of the secondary coolant every 31 days. This changes the CTS by deleting CTS Table 4.7-2 Item 2.b and the CTS Table 4.7-2 Item 2.a qualifying statement of "whenever the gross activity determination indicates iodine concentrations greater than 10 percent of the allowable limit" in Item 2.a, and keeping the Frequency at 31 days all the time.	SR 3.7.17.1	Table 4.7-2 Items 2.a and 2.b
3.8.1 M01	CTS 4.8.1.1.2.a.4, the normal EDG start test, requires that each EDG accelerates up to 900 rpm. CTS 4.8.1.1.2.c.4, the quickstart test, requires that each EDG accelerates up to 900 rpm in less than or equal to 10 seconds. ITS SR 3.8.1.2 requires that each EDG start from standby conditions and achieves steady state voltage ≥ 3744 and ≤ 4400 volts (V) and frequency ≥ 59.5 Hz and ≤ 60.5 Hz. ITS SR 3.8.1.8, the 184 day quickstart test, requires each EDG to achieve a voltage ≥ 4031 V and a frequency ≥ 58.8 Hz in ≤ 10 seconds and achieves a steady state voltage ≥ 3744 and ≤ 4400 V and frequency ≥ 59.5 Hz and ≤ 60.5 Hz. This changes the CTS by providing specific steady state voltage and frequency limits for both Surveillances and a minimum voltage limit to be achieved within 10 seconds for the 184 day Surveillance. The change in the speed requirement for the 184 day Surveillance is discussed in DOC L11.	SR 3.8.1.2 SR 3.8.1.8	4.8.1.1.2.a.4 4.8.1.1.2.c.4

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 M02	CTS 4.8.1.1.2.a.5 and CTS 4.8.1.1.2.c.5 require each EDG to be synchronized and loaded for ≥ 60 minutes. ITS SR 3.8.1.3 requires the same test, however two additional Notes have been added which place restrictions on the test. Notes 3 and 4 modify the CTS requirements by stating that the SR shall be conducted on only one EDG at a time, and the SR shall be preceded by and immediately follow, without a shutdown of the EDG, a successful performance of ITS SR 3.8.1.2 or ITS SR 3.8.1.8. This changes the CTS by adding restrictions when performing this test.	SR 3.8.1.2	4.8.1.1.2.a.4 4.8.1.1.2.c.4
3.8.1 M03	CTS 4.8.1.1.2.a.5 and CTS 4.8.1.1.2.c.5 require, in part, verification that each EDG is loaded to ≥ 1000 kW. ITS 3.8.1.3 requires the same verification, however the test is performed at 2340 to 2600 KW, which corresponds to 90 percent and 100 percent of rated load. This changes the CTS by requiring the EDGs to be tested at a higher load during this Surveillance.	SR 3.8.1.3	4.8.1.1.2.a.4 4.8.1.1.2.c.4
3.8.1 M04	ITS SR 3.8.1.5 requires that each day tank be checked for accumulated water and to remove it every 31 days. ITS SR 3.8.1.11 requires that all actions encountered from the loss of offsite power, including shedding of the non-essential loads and energization of the essential buses and respective loads from the EDG. It also demonstrates the capability of the EDG to automatically achieve the required voltage and frequency with a specific time. ITS SR 3.8.1.14 requires that the diesel engine can restart from a hot condition and achieve the required voltage and frequency with a specific time. This changes the CTS by adding these SRs.	SR 3.8.1.5 SR 3.8.1.11 SR 3.8.1.14	None

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 M05	CTS 4.8.1.1.2.d.1 requires the verifying that the EDG is capable of rejecting a load equal to the largest single emergency load supplied by the generator without tripping. This surveillance does not specify that a EDG shall be tested at a specific power factor. ITS SR 3.8.1.10 requires the verification that each EDG can reject a load equal to or greater than its associated single largest post-accident load. The SR additionally states in Note 2 "If performed with the EDG synchronized with offsite power, it shall be performed within the power factor limit. However, if grid conditions do not permit, the power factor limit is not required to be met. Under this condition the power factor shall be maintained as close to the limit as practicable." This changes the CTS requirement by specifying a power factor limit if the testing is conducted by synchronizing with the offsite sources. Other changes to CTS 4.8.1.1.2.d.1 are discussed in DOC M08.	SR 3.8.1.10	4.8.1.1.2.d.1

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 M06	CTS 4.8.1.1.2.d.3 requires verification that the diesel generator operates for ≥ 60 minutes while loaded to ≥ 2000 kW. ITS SR 3.8.1.13 requires an endurance and load test for each EDG. The endurance and load test requires that the EDGs be operated for ≥ 8 hours, with ≥ 2 hours loaded at ≥ 2730 kW and ≤ 2860 kW and the remaining 6 hours loaded at ≥ 2340 kW and ≤ 2600 kW. This Surveillance is modified by Note 1 and Note 3. Note 1 states that "momentary transients outside the load and power factor ranges do not invalidate this test." Note 3 states "If performed with EDG synchronized with offsite power, it shall be performed within the power factor limit. However, if grid conditions do not permit, the power factor limit is not required to be met. Under this condition the power factor shall be maintained as close to the limit as practicable." This changes the CTS by requiring the emergency diesel generators to be tested for a longer duration, at a high loading, and within a power factor limit, with an allowance to not meet the load or power factor requirements due to momentary transients.	SR 3.8.1.13	4.8.1.1.2.d.3
3.8.1 M07	CTS 4.8.1.1.2.d.2.(b) requires, in part, verification that the diesel starts on auto-start signal, energizes the essential buses with permanently connected loads, energizes the auto-connected essential loads, and operates for ≥ 5 minutes. ITS SR 3.8.1.15 contains the same verification; however the Surveillance also requires verifying that the EDG starts and energizes the permanently connected loads in ≤ 10 seconds and the EDG achieves steady-state voltage and steady-state frequency. This changes the CTS by requiring the EDGs to startup within a certain time limit and to be operated at a specific steady-state voltage and frequency.	SR 3.8.1.15	4.8.1.1.2.d.2.(b)

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 M08	CTS 4.8.1.1.2.d.1 requires verification that each EDG can reject a load equivalent to the largest single emergency load without tripping the EDG. ITS SR 3.8.1.10 also requires verification that each EDG can reject a load equivalent to the largest single emergency load, except the acceptance criterion is that the EDG frequency is maintained ≤ 66.75 Hz following the load reject, which is below the EDG overspeed trip setpoint. This changes the CTS by requiring the EDG to maintain a frequency ≤ 66.75 Hz following the load reject instead of not tripping the EDG.	SR 3.8.1.10	4.8.1.1.2.d.1
3.8.2 M01	CTS 3.8.1.2.a requires one qualified circuit between the offsite transmission network and the onsite Class 1E distribution system to be OPERABLE. ITS LCO 3.8.2.a requires one qualified circuit between the offsite transmission network and the onsite 1E AC electrical power distribution subsystem(s) required by LCO 3.8.10, "Distribution Systems – Shutdown," to be OPERABLE. This changes the CTS by being specific as to what the required circuit must be capable of powering.	3.8.2.a	3.8.1.2.a
3.8.2 M02	CTS 3.8.1.2.b requires one EDG to be OPERABLE. ITS LCO 3.8.2.b requires one EDG capable of supplying one train of the onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.10. This changes the CTS by being specific as to what the required EDG must be capable of powering.	3.8.2.b	3.8.1.2.b
3.8.2 M03	CTS 3.8.1.2 is applicable during MODES 5 and 6. ITS 3.8.2 is applicable in MODES 5 and 6, and during the movement of irradiated fuel assemblies. In addition, a Note has been added to the ACTIONS of ITS 3.8.2 which states that LCO 3.0.3 is not applicable. This changes the CTS by requiring the AC Sources to be OPERABLE under more conditions than is currently required.	3.8.2 Applicability 3.8.2 ACTIONS Note	3.8.1.2

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.2 M04	The CTS 3.8.1.2 Action requires the suspension of CORE ALTERATIONS and positive reactivity changes when a required AC Source is inoperable. It does not include an action to restore the inoperable AC Source. ITS 3.8.2 Required Actions A.2.3 and B.3 require the immediate initiation of action to restore the required AC Sources to OPERABLE status. This changes the CTS by adding explicit requirements to restore the inoperable AC Sources to OPERABLE status.	3.8.2 Required Actions A.2.3 and B.3	3.8.1.2 Action
3.8.3 M01	The CTS does not provide any EDG lube oil requirements. ITS LCO 3.8.3, in part, requires the lube oil inventory to be within limits for each required EDG. The Applicability for this requirement is when the associated EDG is required to be OPERABLE. ITS SR 3.8.3.2 requires a verification that the lube oil inventory is ≥ 260 gallons for each EDG. ITS 3.8.3 ACTION B provides an ACTION if the limit of ITS SR 3.8.3.2 is not met. This changes the CTS by adding a lube oil inventory requirement, and an appropriate ACTION and SR.	3.8.3, 3.8.3 ACTION B SR 3.8.3.2	None

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.3 M02	CTS 3/4.8.1.1 does not provide any requirements for stored diesel fuel oil total particulate level or new diesel fuel oil properties. ITS SR 3.8.3.3 requires a verification that new and stored fuel oil properties are tested and maintained within limits, as specified in the Diesel Fuel Oil Testing Program. This includes stored fuel oil total particulate level and new fuel oil properties. The addition of this SR is discussed in DOC A04. Due to this addition, two new ACTIONS have been added. ITS 3.8.3 ACTION C specifies the compensatory actions for one or more EDG with stored fuel oil total particulates not within limits. ITS 3.8.3 Required Action C.1 requires the restoration of the fuel oil total particulates to within limits in 7 days. ITS 3.8.3 ACTION D specifies the compensatory actions for one or more EDGs with new fuel oil properties not within limits. ITS 3.8.3 Required Action D.1 requires the restoration of the stored fuel oil properties to within limits within 30 days. This changes the CTS by providing explicit ACTIONS for fuel oil total particulates and new fuel oil properties limits not met.	3.8.3 ACTIONS C and D SR 3.8.3.3	None
3.8.3 M03	The CTS does not provide any starting air receiver pressure requirements. ITS LCO 3.8.3, in part, requires the required starting air receiver pressure to be within limits for each required EDG. The Applicability for this requirement is when the associated EDG is required to be OPERABLE. ITS SR 3.8.3.4 requires verification that the required starting air receiver pressure is ≥ 210 psig for each EDG. ITS 3.8.3 ACTION E provides an ACTION if the limit of ITS SR 3.8.3.4 is not met. This changes the CTS by adding a starting air receiver pressure requirement, and an appropriate ACTION and SR.	3.8.3 3.8.3 ACTION E SR 3.8.3.4	None

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.3 M04	While CTS 4.8.1.1.2.b specifies the requirements for the properties of stored fuel oil, the CTS does not provide any specific testing requirements to check for or remove accumulated water from the fuel oil storage tank. ITS SR 3.8.3.5 requires this verification every 31 days. This changes the CTS by requiring a new SR to check for and remove accumulated water from the fuel oil storage tank.	SR 3.8.3.5	None
3.8.5 M01	CTS 4.8.2.4 is applicable in MODES 5 and 6. ITS 3.8.5 is applicable in MODE 5 and 6 and during movement of irradiated fuel assemblies. A Note has been added to the ACTIONS which states that LCO 3.0.3 is not applicable. This changes the CTS by adding the Applicability of during movement of irradiated fuel assemblies and adds the Note to the ACTIONS stating that LCO 3.0.3 is not applicable.	3.8.5 ACTIONS Note	4.8.2.4
3.8.6 M01	CTS 4.8.2.3.2 specifies the Surveillances for the Train A and Train B batteries while the unit is operating and CTS 4.8.2.4.2 specifies the Surveillances for the Train A and Train B batteries during shutdown. ITS 3.8.6 includes a new Surveillance. ITS SR 3.8.6.1 requires the verification every 7 days that each battery float current is ≤ 2 amps. This changes the CTS by adding an explicit Surveillance for battery float current	SR 3.8.6.1	4.8.2.3.2 4.8.2.4.2
3.8.6 M02	CTS 4.8.2.3.2.b.1 and the Category B limits in Table 4.8-1, in part, require verification that electrolyte level of each battery connected cell be within limit every 92 days. CTS 4.8.2.3.2.b.3 requires the electrolyte temperature of every sixth connected cell be verified within limit every 92 days. ITS SR 3.8.6.3 requires verification of each battery connected cell electrolyte level is greater than or equal to the established limit every 31 days. ITS SR 3.8.6.4 requires verifications of each pilot cell temperature is within limits every 31 days. This changes the CTS by increasing the frequency of performance of the Surveillances from 92 days to 31 days.	SR 3.8.6.3 SR 3.8.6.4	4.8.2.3.2.b.1 4.8.2.3.2.b.3

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.7 M01	The CTS does not have any requirement for inverters to be OPERABLE in MODES 1, 2, 3, and 4. ITS 3.8.7 requires the Train 1 and Train 2 inverters to be OPERABLE in MODES 1, 2, 3, and 4. This changes the CTS by incorporating the requirements of ITS 3.8.7.	3.8.7	None
3.8.8 M01	The CTS does not have any requirement for inverters to be OPERABLE in MODES 5 and 6, and during movement of irradiated fuel assemblies. ITS 3.8.8 requires one inverter to be OPERABLE to support the 120 volts alternating current (VAC) vital electrical distribution subsystem required by LCO 3.8.10, "Distribution Systems-Shutdown." This changes the CTS by incorporating the requirements of ITS 3.8.8.	3.8.8	None
3.8.9 M01	CTS 3.8.2.1 Action states that with less than the above complement of AC buses OPERABLE, to restore the inoperable bus to OPERABLE status within 8 hours. CTS 3.8.2.3 Action a states that with one 125 VDC bus inoperable, to restore the inoperable bus to OPERABLE status within 2 hours. However, there are no limitations to preclude a loss of function due to numerous concurrently inoperable AC and DC buses. ITS 3.8.9 ACTION E has been added, requiring entry into ITS 3.0.3 if the loss of two or more electrical power distribution subsystems results in a loss of safety function.	3.8.9 ACTION E	3.8.2.1 3.8.2.3
3.8.9 M02	CTS 4.8.2.1 states the specified AC buses shall be determined OPERABLE by verifying correct breaker alignment and "indicated power availability." ITS SR 3.8.9.1 requires the verification of correct breaker alignments and "voltage" to required AC and AC vital bus electrical power distribution subsystems. This changes the CTS by requiring the verification of the correct voltages to the required AC and vital bus electrical power distribution subsystems, whereas the CTS only requires verification of indicated power.	SR 3.8.9.1	4.8.2.1

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.10 M01	CTS LCO 3.8.2.2 requires a minimum of one 4160 V essential bus, one 480 V essential bus, and three 120 Vac vital buses to be OPERABLE. CTS LCO 3.8.2.4 requires one 250/125 VDC MCC to be OPERABLE. The existing requirement of CTS LCO 3.8.2.2 and LCO 3.8.2.4 for distribution buses to be OPERABLE during shutdown conditions is not specific as to what the system must be powering. ITS 3.8.10 specifies that the necessary portions of Train 1 and Train 2 AC, Train 1 and Train 2 250 VDC, and Train 1 and Train 2 AC vital bus electrical power distribution subsystems must be OPERABLE to support equipment required to be OPERABLE. In addition, an optional Required Action (ITS 3.8.10 Required Action A.1) has been added which allows the associated supported required feature(s) to be declared inoperable. This change adds a requirement that the applicable portions of Train 1 and Train 2 AC, Train 1 and Train 2 125 VDC, and Train 1 and Train 2 AC vital bus electrical power distribution subsystems must be OPERABLE when required to support equipment required to be OPERABLE by the Technical Specifications. This could require more buses to be OPERABLE than is currently required. In addition, an action has been added to allow an option to the existing actions.	3.8.10 3.8.10 Required Action A.1	3.8.2.2 3.8.2.4
3.8.10 M02	CTS 4.8.2.2 and CTS 4.8.2.4 are applicable in MODES 5 and 6. ITS 3.8.10 is applicable in MODE 5 and 6 and during movement of irradiated fuel assemblies. A Note has been added to the ACTIONS which states that LCO 3.0.3 is not applicable. This changes the CTS by adding the Applicability of during movement of irradiated fuel assemblies and adds the Note to the ACTIONS stating that LCO 3.0.3 is not applicable.	3.8.10 ACTIONS Note	4.8.2.2 4.8.2.4

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.10 M03	CTS 4.8.2.2 states the specified buses shall be determined OPERABLE by verifying correct breaker alignment and "indicated power availability." ITS SR 3.8.10.1 requires the verification of correct breaker alignments and "voltage" to required AC and AC vital buses electrical power distribution subsystems. This changes the CTS by requiring the verification of the correct voltages to the required AC and AC vital bus electrical power distribution subsystems, whereas the CTS only requires verification of indicated power availability.	SR 3.8.10.1	4.8.2.2
3.9.4 M01	CTS 3.9.8.1 requires that at least one decay heat removal loop be in operation. ITS 3.9.4 requires that one DHR loop shall be OPERABLE and in operation. This changes the CTS by requiring the DHR loop to also be OPERABLE, instead of just in operation.	3.9.4	3.9.8.1
3.9.4 M02	CTS 3.9.8.1 requires one DHR loop to be in operation in MODE 6 when the water level above the top of the irradiated fuel assemblies seated within the reactor pressure vessel is ≥ 23 feet. ITS 3.9.4 requires one DHR loop to be OPERABLE and in operation when water level is ≥ 23 feet above the top of the reactor vessel flange. This changes the CTS by changing the point at which either one or two DHR loops are required to be OPERABLE and one in operation. The change requiring the DHR loop to be OPERABLE is discussed in DOC M01.	3.9.4	3.9.8.1
3.9.4 M03	The CTS 3.9.8.1 Actions do not include an action to immediately initiate action to satisfy the DHR loop requirements in the event the DHR loop requirements are not met. ITS 3.9.4 Required Action A.3 requires that action be immediately initiated to satisfy the DHR loop requirements. This changes the CTS by requiring that action be taken immediately to satisfy the DHR loop requirements.	3.9.4 Required Action A.3	3.9.8.1 Actions

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.4 M04	CTS 3.9.8.1 Action b states that the DHR loop may be removed from operation for up to 1 hour per 8 hour period during the performance of CORE ALTERATIONS in the vicinity of the reactor pressure vessel hot legs. The ITS LCO 3.9.4 Note states that the required DHR loop may be removed from operation for ≤ 1 hour per 8 hour period, provided no operations are permitted that would cause introduction of coolant into the RCS with boron concentration less than that required to meet the minimum required boron concentration of LCO 3.9.1, "Boron Concentration." This results in two changes to the CTS. First, the allowance to remove DHR from operation is no longer restricted to CORE ALTERATIONS in the vicinity of the reactor pressure vessel hot legs. Second, the use of the allowance in the ITS is predicated on prohibiting operations that would cause introduction of coolant into the RCS with a boron concentration less than that required to meet the boron concentration of LCO 3.9.1.	LCO 3.9.4 Note	3.9.8.1 Action b
3.9.4 M05	CTS 4.9.8.1 verifies that the DHR loop is in operation and circulating RC and provides two flow rate requirements. CTS 4.9.8.1.a requires ≥ 2800 gpm when a reduction in boron concentration is in progress and CTS 4.9.8.1.b requires a flow rate sufficient to maintain core outlet temperature ≤ 140°F when a reduction in boron concentration is not in progress. The 2800 gpm flow requirement is also used in CTS 3.9.8.1 footnote *. ITS SR 3.9.4.1 requires the flow rate to be ≥ 2800 gpm under all conditions. This changes the CTS by requiring a higher flow rate when a reduction in boron concentration is not in progress.	SR 3.9.4.1	4.9.8.1 4.9.8.1.a 4.9.8.1.b

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.5 M01	CTS 4.9.8.2 requires that at least one DHR loop be determined to be in operation per Specification 4.9.8.1, the DHR loop flow rate verification. However, CTS LCO 3.9.8.2 does not require a DHR loop to be in operation; it just requires two DHR loops to be OPERABLE, and no Actions are provided if a DHR loop is not in operation. ITS 3.9.5 requires one of the DHR loops to be in operation, as modified by the LCO 3.9.5 Note 1 allowance. In addition, ITS 3.9.5 ACTION B provides the actions when the required DHR loop is not in operation. This changes the CTS by providing requirements for one DHR loop to be in operation and appropriate actions when the DHR loop is not in operation.	LCO 3.9.5, including Note 1 3.9.5 ACTION B	3.9.8.2 4.9.8.2
3.9.5 M02	CTS 3.9.8.2 requires two DHR loops to be in OPERABLE in MODE 6 when the water level above the top of the irradiated fuel assemblies seated within the reactor pressure vessel is < 23 feet. ITS 3.9.5 requires two DHR loops to be OPERABLE and one in operation when water level is < 23 feet above the top of the reactor vessel flange. This changes the CTS by changing the point at which either one or two DHR loops are required to be OPERABLE and one in operation. The change requiring the DHR loop to be in operation is discussed in DOC M01.	3.9.5 Applicability	3.9.8.2 Applicability
3.9.5 M03	CTS 3.9.8.2 Action a states that with less than the required DHR loops OPERABLE, immediately initiate corrective action to return the required DHR loops to OPERABLE status as soon as possible. ITS 3.9.5 ACTION B includes the same requirement, but also includes additional requirements when both DHR loops are inoperable. This changes the CTS by requiring additional actions when both DHR loops are inoperable.	3.9.5 ACTION B	3.9.8.2 Action a

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.5 M04	The CTS 3.9.8.2 requires two independent DHR loops to be OPERABLE. ITS SR 3.9.5.2 requires verification every 7 days of correct breaker alignment and that indicated power is available to the required DHR pump not in operation. A Note states that the SR is not required to be performed until 24 hours after a required DHR pump is not in operation. This changes the CTS by adding a SR.	SR 3.9.5.2	None
3.9.6 M01	CTS 3.9.10 requires a minimum of 23 feet of water be maintained over the top of irradiated fuel assemblies seated within the reactor pressure vessel. ITS 3.9.6 requires 23 feet of water be maintained above the top of the reactor vessel flange. This changes the CTS by increasing the amount of water that must be in the refueling canal during fuel movement.	3.9.6	3.9.10
3.9.6 M02	CTS 3.9.10 is applicable during movement of fuel assemblies or CRs within the "reactor pressure vessel" while in MODE 6. The CTS 3.9.10 Action states that with the reactor vessel water level not within limit, suspend movement of fuel assemblies or CRs within the "reactor pressure vessel." The ITS 3.9.6 Applicability is during movement of irradiated fuel assemblies within "containment." ITS 3.9.6 Required Action A.1 requires the suspension of movement of irradiated fuel assemblies within "containment". This changes the CTS by expanding the suspension of movement of fuel assemblies from within the "reactor pressure vessel" to within the "containment." The change to "irradiated fuel assemblies" from "fuel assemblies" is discussed in DOC L01. The change eliminating MODE 6 is discussed in DOC A02. The change eliminating CRs is discussed in DOC L02.	3.9.6 Applicability 3.9.6 Required Action A.1	3.9.10 Applicability 3.9.10 Action

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.1 M01	ITS 5.1.1 requires that the plant manager or his designee approve, prior to implementation, each proposed test, experiment, or modification to systems or equipment that affects nuclear safety. ITS 5.1.2 provides the requirement that a designated individual assume the responsibility for the control room command function. In MODES 1, 2, 3, and 4, ITS 5.1.2 requires the designated individual hold an active Senior Operator license. In MODE 5 or 6, ITS 5.1.2 requires the designated individual hold an active Senior Operator license or Operator license. This changes the CTS by adding an approval requirement for the plant manager or his designee and by adding requirements for the designated individual that assumes the control room command function.	5.1.1 5.1.2	None
5.2 M01	CTS Table 6.2-1 requires the minimum shift crew to include one STA when the unit is in MODE 1, 2, 3, or 4. ITS 5.2.2 requires that an individual provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit, when the unit is in MODE 1, 2, 3, or 4. It furthermore states that the individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift. This changes the CTS by detailing the specific responsibilities of the STA.	5.2.2	Table 6.2-1
5.4 M01	ITS 5.4.1.b requires written procedures be established, implemented, and maintained for the emergency operating procedures required to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33. The CTS does not include this requirement. This changes the CTS by adopting a new requirement for emergency operating procedures.	5.4.1.b	None

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.4 M02	ITS 5.4.1.e requires written procedures be established, implemented, and maintained for all programs specified in Specification 5.5. The CTS does not include this requirement for any program except the ODCM. This changes the CTS by adopting a new requirement for procedures to address all programs described in ITS 5.5.	5.4.1.e	None
5.5 M01	The CTS does not include program requirements for an Allowable Operating Transient Cycles Program or a Safety Function Determination Program. The ITS includes programs for these activities. This changes the CTS by adding the Allowable Operating Transient Cycles Program and Safety Function Determination Program (SFDP).	5.5.5 5.5.14	None

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.5 M02	CTS 4.8.1.1.2.b requires verifying every 92 days that a sample of diesel fuel from the fuel oil storage tank is within the acceptable limits specified in Table 1 of ASTM D975-68 when checked for viscosity, water, and sediment. In addition, no testing is currently required on new fuel oil prior to addition to the fuel oil storage tank. ITS 5.5.12.a restricts the acceptability of new fuel oil for use prior to addition to storage tanks by requiring the determination that the fuel oil has an API gravity or a absolute specific gravity within limits, a flash point and kinematic viscosity within limits, and either a clean and bright appearance with proper color or a water and sediment content within limits. ITS 5.5.12.b requires all other properties of new fuel to be verified within 31 days following addition of the new fuel oil to the storage tank. ITS 5.5.12.c requires the total particulate concentration of the stored fuel oil to be ≤ 10 mg/l when tested every 31 days. This changes the CTS by providing restrictions on the acceptability of new fuel oil prior to addition to the fuel oil storage tank and after addition to the fuel oil storage tank, and providing a requirement that the total particulate concentration of the stored fuel oil be ≤ 10 mg/l when tested every 31 days.	5.5.12.a 5.5.12.b 5.5.12.c	4.8.1.1.2.b

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.5 M03	CTS 3.11.1 requires that the quantity of radioactive material contained in each unprotected outside temporary tank shall be less than or equal to 10 curies. ITS 5.5.11 requires that the quantity of radioactivity contained in each outside storage tank that is not surrounded by liners, dikes, or walls, capable of holding the tank's contents and that does not have tank overflows and surrounding area drains connected to the Liquid Radwaste Treatment System is less than the amount that would result in concentrations less than the limits of 10 CFR 20, at the nearest potable water supply and the nearest surface water supply in an unrestricted area, in the event of an uncontrolled release of the tank's contents. This changes the CTS by requiring all outside tanks that are not surround by liners, dikes, or walls, capable of holding the tanks' contents and that do not have tank overflows and surrounding area drains connected to the Liquid Radwaste Treatment System to be part of the program not just temporary outside storage tanks.	5.5.11	3.11.1.a

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.5 M04	CTS 3.11.1 controls the quantity of radioactive material contained in each unprotected outside temporary tank. Note * to CTS 3.11.1 essentially defines unprotected as those outdoor tanks that are not surrounded by liners, dikes, or walls capable of holding the tank contents "or" that do not have tank overflows and surrounding area drains connected to the liquid radwaste treatment system. That is, if either of the options is provided for a tank, the CTS 3.11.1 requirements are not applicable to the tank, since it is not unprotected. ITS 5.5.11 includes similar requirements on unprotected outdoor tanks, but changes the "or" in the CTS Note * description of unprotected to an "and." That is, for a tank to be considered as protected it must be surrounded by liners, dikes, or walls capable of holding the tank contents "and" it must have tank overflows and surrounding area drains connected to the liquid radwaste treatment system. This changes the CTS by requiring all outside tanks that are not surrounded by liners, dikes, or walls, capable of holding the tank's contents and that do not have tank overflows and surrounding area drains connected to the Liquid Radwaste Treatment System to be part of the Program.	5.5.11.b	3.11.1 Note *
5.6 M01	The second paragraph of ITS 5.6.1 includes details required to be included in the Annual Radiological Environmental Operating Report. CTS 6.9.1.10 does not contain this level of detail. This changes the CTS by requiring additional detail to be included in the Annual Radiological Environmental Operating Report.	5.6.1	6.9.1.10

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.7 M01	CTS 6.12.1.d.4 provides one of the options for an individual entering a high radiation area, and requires the individual to be under the surveillance, by means of closed circuit television, by personnel qualified in radiation protection procedures. ITS 5.7.1.d.4.(ii) includes a similar option; however it includes an additional requirement that the person have a means of communicating with the individuals in the high radiation area who are covered by such surveillance. This changes the CTS by requiring means to communicate with the associated individuals in the high radiation area.	5.7.1.d.4.(ii)	6.12.1.d.4